MAY 28 2019

Nick Kostka
J.G. Boswell Company
PO Box 457
Corcoran, CA 93212

Re: Notice of Preliminary Decision – Emission Reduction Credits
   Facility Number: S-714
   Project Number: S-1183830

Dear Mr. Kostka:

Enclosed for your review and comment is the District’s analysis of J.G. Boswell Company’s application for Emission Reduction Credits (ERCs) resulting from the permanent shutdown of facility S-714, at 31500 S Lake Rd., Bakersfield. The quantity of ERCs proposed for banking is 1,035 lb-NOx/yr, 82 lb-SOx/yr, 35,587 lb-PM10/yr, 199 lb-CO/yr, and 60 lb-VOC/yr.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice comment period, the District intends to issue the ERCs. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Ms. Silvana Procopio of Permit Services at (661) 392-5606.

Sincerely,

Arnaud Marjollet
Director of Permit Services

AM:SP

Enclosures

cc: Brian Clerico, CARB (w/enclosure) via email
    cc: Gerardo C. Rios, EPA (w/enclosure) via email
I. Summary

J.G. Boswell Company operated a cotton ginning facility in Bakersfield, CA. On June 29, 2018 the facility shut down the entire operation due to water supply shortage and market conditions.

On October 23, 2018, the District received an application from the operator requesting Emission Reduction Credits (ERCs) for criteria pollutants VOC, NOx, CO, PM$_{10}$, and SOx for the shutting down of the facility. On January 8th 2019, all facility permits were cancelled.

Permit to Operate S-714-1-15 (Saw Gin) was designated as dormant emissions unit (DEU) in 2010. Therefore, no real emissions occurred during the baseline period, which is based on the last five years of operation. Therefore, no actual emissions reductions will take place and no further calculations for this unit are necessary.

Furthermore, PEER boiler S-714-PEER-1-0 will be shut down. A PEER unit is not required to have a permit to operate and is not subject to the requirements of Rule 2201 (New and Modified Stationary Source Review Rule). If an identical unit was to be brought back into operation, it would not require an ATC and therefore would not be subject to Rule 2201 New Source Review requirements. As such, the related emission reduction is not enforceable. Because the emission reduction related to the shutdown of boiler S-714-PEER-1-0 is not enforceable, it will not be considered further in this analysis.

Based on the historical operating data prior to the shutdown, the amount of bankable ERCs (as calculated in Section V of this document) are shown in the table below. Calculations in Section V are according to the provisions of District Rules 2201 and 2301.


### Bankable Emissions (lb/quarter)

<table>
<thead>
<tr>
<th></th>
<th>NOx</th>
<th>SOx</th>
<th>PM10</th>
<th>CO</th>
<th>VOC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Q2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Q3</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Q4</td>
<td>1,035</td>
<td>82</td>
<td>35,587</td>
<td>199</td>
<td>60</td>
</tr>
</tbody>
</table>

### II. Applicable Rules

- **Rule 2201** - New and Modified Stationary Source Review Rule (2/18/16)
- **Rule 2301** - Emission Reduction Credit Banking (1/19/12)
- **Rule 4201** - Particulate Matter Concentration (12/17/92)
- **Rule 4202** - Particulate Matter Emission Rate (12/17/92)
- **Rule 4204** - Cotton Gins (2/17/05)

### III. Location of Reductions

The cotton ginning operation was located at 31500 S Lake Rd in Bakersfield, Kern County, CA.

### IV. Method of Generating Reductions

The actual emissions reductions (AERs) were generated by the shutdown of a permitted cotton ginning operation. The equipment description for the emissions units at this facility is as follows:

**Equipment Description**

**S-714-1-15:** DORMANT 13.5 MMBTU/HR SAW-TYPE COTTON GIN (GIN #11)

**S-714-2-0:** 18 MMBTU/HR ROLLER-TYPE COTTON GIN WITH MODULE FEEDER, TELESCOPE SUCTION, 4 TOWER DRYERS WITH ONE 2 MMBTU/HR AND TWO 8 MMBTU/HR NATURAL GAS/LPG BURNERS, 8 CLEANERS, 4 STICK MACHINES, 24 ROLLER GIN STANDS, OVERFLOW SYSTEM, 2 COMBING LINT CLEANERS, 2 AIR BLAST LINT CLEANERS, BATTERY CONDENSER, AND NON-PNEUMATIC TRASH SYSTEM
V. Calculations

A. Assumptions

**Particulate Emissions from Ginning Operation (S-714-2-0):**

- Based on applicant information for the operating seasons prior to the shutdown (from 2008 to 2017), shown below, the typical operating schedule is the fourth quarter of each year (Q4).
- The normal source operation is determined based on the typical throughput of cotton, in 500-lb bales.
- PM$_{2.5}$ fraction (% of the PM$_{10}$ that is also PM$_{2.5}$) = 1.9% (Appendix B).

**Natural Gas Combustion from Cotton Dryers (S-714-2-0):**

- The cotton gin included 4 dryers with one 2 MMBtu/hr burner and two 8 MMBtu/hr burners, for a total maximum input heat rating of 18 MMBtu/hr. All burners were fired on natural gas (per emissions inventory reports throughout the years and per applicant’s ERC banking application.)
- The emission factor for PM10 is given in lb-PM10 per 500-lb bale. This figure includes the PM10 emissions from the combustion of natural gas. As such, there is no separate PM10 calculation regarding the use of natural gas.
- Conversion: 1 MMBtu = 10 therm.

The applicant provided production and fuel usage records for the last ten years. In instances where the applicant-provided production rate or fuel quantity does not match the emissions inventory submitted for that year, the most conservative (lowest) values will be used in calculations.

The following table shows the most conservative (lowest) cotton production and fuel usage data from either the applicant or the emission inventory.

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1</td>
<td>2,743</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q4</td>
<td>51,783</td>
<td>43,636</td>
<td>46,998</td>
<td>51,166</td>
<td>65,025</td>
<td>56,667</td>
<td>37,479</td>
<td>13,318</td>
<td>25,724</td>
<td>24,937</td>
</tr>
<tr>
<td>Total</td>
<td>54,526</td>
<td>43,636</td>
<td>46,998</td>
<td>51,166</td>
<td>65,025</td>
<td>56,667</td>
<td>37,479</td>
<td>13,318</td>
<td>25,724</td>
<td>24,937</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Q1</td>
<td>8,887</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Q4</td>
<td>173,137</td>
<td>129,103</td>
<td>161,193</td>
<td>153,502</td>
<td>173,075</td>
<td>144,357</td>
<td>86,130</td>
<td>38,366</td>
<td>78,919</td>
<td>67,530</td>
</tr>
<tr>
<td>Total</td>
<td>182,024</td>
<td>129,103</td>
<td>161,193</td>
<td>153,502</td>
<td>173,075</td>
<td>144,357</td>
<td>86,130</td>
<td>38,366</td>
<td>78,919</td>
<td>67,530</td>
</tr>
</tbody>
</table>

Source: ERC banking application submitted except year 2015, which emissions inventory amount was more conservative.
B. Emission Factors (EF)

Cotton Ginning Emissions:

District Policy APR 1110, Use of Revised Generally Accepted Emission Factors, directs the use of emission factors (EF) that reflect "best data" when estimating emissions. For example, when facility-specific Continuous Emissions Monitoring or source test data is available, it will be used as emission factors (unless it is in violation of permit conditions or other requirements).

For those pollutants and/or equipment that didn’t have source testing performed, the permitted emission factors included in their permits or AP-42 emission factors will be used. When test results were performed and permitted emission factors were established in the permit, source test results will be used if they are lower (more conservative) than the permitted EFs. However, if test results are above the permitted EFs for any pollutant, then the permitted EFs will be used for ERC calculations.

For this facility, the 1st stage pre-cleaning system listed under unit 1-2-0 was source tested in 2002 and the results for PM10 were 0.252 lbPM10/500-lb bale. The permitted emission factor was 0.24 lbPM10/500-lb bale. Therefore, the permitted emission factor will be used.

**Unit S-714-2-0: ROLLER-TYPE COTTON GIN**

<table>
<thead>
<tr>
<th>Equipment</th>
<th>PM10 EF (lb/500-lb bale)</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>1st Stage Pre-cleaning System</td>
<td>0.24</td>
<td>Permit limit</td>
</tr>
<tr>
<td>2nd Stage Pre-cleaning System</td>
<td>0.082</td>
<td>Source Testing 2002 (Appendix C)</td>
</tr>
<tr>
<td>Battery Condenser System</td>
<td>0.065</td>
<td>Source Testing 2002 (Appendix C)</td>
</tr>
<tr>
<td>Overflow System</td>
<td>0.023</td>
<td>Source Testing 2002 (Appendix C)</td>
</tr>
<tr>
<td>Rotolift System</td>
<td>0</td>
<td>Permit limit</td>
</tr>
<tr>
<td>Lint Cleaner System</td>
<td>0.08</td>
<td>Permit limit</td>
</tr>
<tr>
<td>Gin Stand</td>
<td>0.06</td>
<td>Permit limit</td>
</tr>
<tr>
<td>Telescope Suction System</td>
<td>0.23</td>
<td>Permit limit</td>
</tr>
<tr>
<td>Main Trash System</td>
<td>0.06</td>
<td>Permit limit</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>0.840</strong></td>
<td>lb/500-lb bale</td>
</tr>
</tbody>
</table>

Natural Gas Combustion:

The cotton gin included four dryers with three burners that provided heated air to control the moisture content of the cotton, included under permit S-714-2. Based on emission inventory reports, these burners were fired on natural gas only and ERCs are requested from their shutdown. Since there is no source data available for the dryers, PTO emissions limits will be used as EFs.

This unit was permitted to run on both natural gas and LPG fuel. Since the unit was only fired on natural gas, pursuant District Policy APR 1720; the SOx emission factor used will be 0.00285 lb/MMBtu instead of the permitted emission factor of 0.008 lb/MMBtu, which reflected the higher sulfur content of LPG.
Unit S-714-2-0: DRYERS

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Emission Factor (lb/MMBtu)</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>0.1</td>
<td>PTO S-714-2-0</td>
</tr>
<tr>
<td>SOx</td>
<td>0.00285</td>
<td>District Policy APR 1720</td>
</tr>
<tr>
<td>PM10</td>
<td>0*</td>
<td></td>
</tr>
<tr>
<td>CO</td>
<td>0.02</td>
<td>PTO S-714-2-0</td>
</tr>
<tr>
<td>VOC</td>
<td>0.006</td>
<td></td>
</tr>
</tbody>
</table>

* Included in PM10 ginning emissions since burner exhaust airflow is discharged through the cyclones

C. Baseline Period Determination and Data

Baseline Period Determination

In accordance with District Rule 2201, Section 3.8, the baseline period is the two consecutive years of operation immediately prior to the submission of the complete application, or another period of at least two consecutive years within the five years immediately prior to the submission of the complete application, if it is more representative of normal source operations.

The PTOs for the cotton ginning operation were surrendered by the facility on October 19, 2018, along with the application to bank the ERCS from the shutdown of the operation. The applicant provided records that show the last production season ended in 2017 (December 5, 2017 was the end of the last production season for this site per the applicant’s records).

Cotton throughput records for the last ten operating seasons (2008-2017) will be used to determine normal source operation. Therefore, the normal source operation will be the average of the 2008 – 2017 operating seasons.

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<td>37,479</td>
<td>13,318</td>
<td>25,724</td>
<td>24,937</td>
</tr>
<tr>
<td>10-yr Avg</td>
<td>41,948</td>
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</tbody>
</table>

As determined above, the source normally processed 41,948 bales per operating season (normal source operation).

The baseline period is one consecutive two-year, three-year, four-year or five-year period within the last five years of operation that most accurately represents the normal source operation.
The average number of bales processed in 2 through 5-year increments from the 2013 through 2017 operating seasons are presented in the following table. For example, the 2-year average for the period 2013-2014 is as follows:

\[
2013-2014 \text{ Average} = \frac{[2013 \text{ Production (bales/year)} + 2014 \text{ Production (bales/year)}]}{2} \\
= \frac{(56,667 + 37,479)}{2} \\
= 47,073 \text{ bales/year}
\]

<table>
<thead>
<tr>
<th>AVERAGE BALES IN RESPECTIVE PERIOD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baseline Period Ending In</td>
</tr>
<tr>
<td>---------------------------</td>
</tr>
<tr>
<td>2014</td>
</tr>
<tr>
<td>2015</td>
</tr>
<tr>
<td>2016</td>
</tr>
<tr>
<td>2017</td>
</tr>
</tbody>
</table>

The number of bales produced in the timeframes specified above are compared to the number of bales produced during normal source operation (41,948 bales) in the following table. The result is the difference between the specified operating period and normal source operation. The number closest to zero identifies the period closest to the normal source operation and, therefore, it is the baseline period. For instance, for the period 2013-2014, the difference is calculated as follows:

\[
2013-2014 \text{ Difference} = \text{Normal Source Operation (bales/year)} - 2013-2014 \text{ Average (bales/year)} \\
= 41,948 - 47,073 \\
= -5,125 \text{ bales/year}
\]

<table>
<thead>
<tr>
<th>DIFFERENCE FROM NORMAL SOURCE OPERATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baseline Period Ending In</td>
</tr>
<tr>
<td>---------------------------</td>
</tr>
<tr>
<td>2014</td>
</tr>
<tr>
<td>2015</td>
</tr>
<tr>
<td>2016</td>
</tr>
<tr>
<td>2017</td>
</tr>
</tbody>
</table>

As shown above for bales produced, the period closest to the normal source operation is the 2-year period 2013-2014 and is, therefore, the baseline period. The number of bales produced and the quantity of natural gas combusted during the baseline period is shown below.
<table>
<thead>
<tr>
<th>Baseline Data</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Year</strong></td>
</tr>
<tr>
<td>2013</td>
</tr>
<tr>
<td>2014</td>
</tr>
<tr>
<td><strong>Average</strong></td>
</tr>
</tbody>
</table>

- During the baseline period of 2013-2014, the facility was operated only in the fourth quarter.
- The average annual cotton throughput during the baseline period was 47,073 bales.
- The calculated average throughput for the baseline period resulted in PM$_{10}$ emissions that were less than the annual limit for PM$_{10}$ emissions (See PTO S-714-2, permit condition #9). The following calculations demonstrate that the permitted emissions limit was not exceeded.

\[
\text{S-714-2 emissions, lb/year = EF}_{PM_{10}} \times \text{Baseline Period Average Throughput (bales/yr)}
\]
\[
= 0.84 \text{ lb-PM}_{10}/\text{bale} \times 47,073 \text{ bales/year}
\]
\[
= 39,541 \text{ lb-PM}_{10}/\text{year} < 120,960 \text{ lb-PM}_{10}/\text{year}
\text{(permit limit)}
\]

- Daily or annual natural gas consumption was not limited by a permit condition.

D. **Historical Actual Emission (HAE) Calculations**

The Historical Actual Emissions (HAE) are calculated using the following formulas and the emission factors and throughputs as discussed above. Results are shown in the following tables:

**Cotton Ginning HAE**

\[
\text{HAE}_{\text{ginning}} = \text{EF (lb-PM}_{10}/\text{bale}) \times \text{average throughput (bales/year)}
\]

<table>
<thead>
<tr>
<th>Historical Actual Emissions (HAE$_{\text{ginning}}$)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Pollutant</strong></td>
</tr>
<tr>
<td>PM$_{10}$</td>
</tr>
</tbody>
</table>
Natural Gas Combustion HAE

\[ HAE_{\text{NG}} = EF \text{ (lb/MMBtu)} \times 0.1 \text{ MMBtu/therm} \times \text{Average Fuel Usage (therm/year)} \]

Average fuel usage for baseline period 2013-2014:

\[ \text{Average Fuel Usage} = \frac{(\text{Fuel Usage 2013} + \text{Fuel Usage 2014})}{2} \]

Unit S-714-2-0 (Dryers):

Average fuel usage  \( = \frac{(144,357 + 86,130)}{2} \)
\[ = 115,244 \text{ therms} \]

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>EF \text{ lb/} \text{MMBtu}</th>
<th>Fuel Usage \text{ therm/year}</th>
<th>Conversion \text{ MMBtu/therm}</th>
<th>HAE \text{ lb/year}</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO\textsubscript{x}</td>
<td>0.1</td>
<td>115,244</td>
<td>0.1</td>
<td>1,152</td>
</tr>
<tr>
<td>SO\textsubscript{x}</td>
<td>0.008</td>
<td>115,244</td>
<td>0.1</td>
<td>92</td>
</tr>
<tr>
<td>PM\textsubscript{10}</td>
<td>0</td>
<td>115,244</td>
<td>0.1</td>
<td>0</td>
</tr>
<tr>
<td>CO</td>
<td>0.02</td>
<td>115,244</td>
<td>0.1</td>
<td>230</td>
</tr>
<tr>
<td>VOC</td>
<td>0.006</td>
<td>115,244</td>
<td>0.1</td>
<td>69</td>
</tr>
</tbody>
</table>

E. Adjustment to Historical Actual Emissions (HAE)

Pursuant to Section 3.23 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.

Emissions Adjusted for Rule 4204 - Cotton Gins

Rule 4204 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. The cotton gin was in compliance with this rule at the time of the ERC application submittal. All the cotton gin's systems were controlled by 1D-3D cyclones. Therefore, no emissions adjustments are needed for this rule.

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

District Rule 4309, 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, the dryers in this operation are exempt from the requirements of this rule and no emissions adjustments are necessary.
**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 NOx, SOx, PM_{10}, CO, or VOC. Therefore, the HAE will be equal to the values calculated in Section V.C of this evaluation.

**F. Post Project Potential to Emit (PE2)**

As discussed above, the subject equipments have been permanently shut down and the PTOs were cancelled by the District. Therefore, PE2 = 0 for all criteria pollutants and for all emissions units.

**G. Air Quality Improvement Deduction**

The air quality improvement deduction (AQID), per Rule 2201, Section 3.6, is 10% of the Actual Emission Reductions (AER), before the AER is eligible for banking. The criteria pollutant AER are adjusted for the AQID in the following table:

\[
\text{AER} = \text{Adjusted HAE} \\
\text{AQID} = \text{AER} \times 10\%
\]

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>AER (lb/yr)</th>
<th>AQID (lb/yr)</th>
<th>Bankable ERCs</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>1,152</td>
<td>117</td>
<td>1,035</td>
</tr>
<tr>
<td>SOx</td>
<td>92</td>
<td>10</td>
<td>82</td>
</tr>
<tr>
<td>PM_{10}</td>
<td>39,541</td>
<td>3,954</td>
<td>35,587</td>
</tr>
<tr>
<td>CO</td>
<td>230</td>
<td>31</td>
<td>199</td>
</tr>
<tr>
<td>VOC</td>
<td>69</td>
<td>9</td>
<td>60</td>
</tr>
</tbody>
</table>

**H. Emission Reductions Eligible for Banking**

For the 2013-2014 baseline period, all operations took place in the 4\textsuperscript{th} quarter. Therefore, the AER are only in the 4\textsuperscript{th} quarter.

The bankable ERCs for criteria pollutants are presented in lb/quarter in the following table.

<table>
<thead>
<tr>
<th>Bankable Emissions (lb/quarter)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
</tr>
<tr>
<td>-----</td>
</tr>
<tr>
<td>Q1</td>
</tr>
<tr>
<td>Q2</td>
</tr>
<tr>
<td>Q3</td>
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<tr>
<td>Q4</td>
</tr>
</tbody>
</table>
VI. Compliance

Rule 2201 - New and Modified Stationary Source Review Rule

Pursuant to Section 3.2.1, any AER must be real, enforceable, quantifiable, permanent, and surplus.

1. Real

The emission reductions were generated by the shutdown of a cotton gin. The emissions were calculated from historic baling records, fuel-use data, recognized emission factors, and source test data. Therefore, the emissions were real.

The ginning equipment has been removed from service and the permits were subsequently surrendered to the District. Therefore, the emission reductions are real.

2. Surplus

To be considered surplus, AER shall be in excess, at the time the application for an ERC is deemed complete, of any emissions reduction which:

- Is required or encumbered by any laws, rules, regulations, agreements, orders, or
- Is attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan, or
- Is proposed in the adopted air quality plan pursuant to the California Clean Air Act.

There are no laws, rules, regulations, agreements, orders, or permits requiring any of the emission reductions which generated the ERC. In summary:

- 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.
- The emission factors are not subject to additional adjustments and are, therefore, surplus to the requirements of the District’s 2007 PM$_{10}$ Maintenance Plan, 2008, 2012, 2015, 2016, and 2018 PM$_{2.5}$ Attainment Plans, and District Rule 4204.
- According to the attached records, the gin did not exceed the permitted baling rates and there were no limits on natural gas consumption, so no adjustments are necessary on that basis.
- The emission reductions are not the result of an action taken by the permittee to comply with any requirement of Rule 4204 Cotton Gins.

Therefore, the emission reductions satisfy the surplus requirement.
3. Permanent

The cotton gin has been shut down and the PTOs have been cancelled. Further operation requires an application to the District for a new operating permit.

Due to the high transportation costs, it is not cost effective to ship field cotton to other locations for processing. As such, the cotton processed at this facility was produced in the surrounding area.

As shown in the following table, cotton acreage within the District dropped significantly in the last 28 years. According to the applicant, this decline in cotton production led to the closure of the facility. Because of the decline in cotton production, it is expected that there will be no load shifting of the past emissions to a similar facility within the San Joaquin Valley. Therefore, the emission reductions are determined to be permanent.

![District-Wide Cotton Production](image)

Cotton acreage as reported by the California Cotton Ginners Association.

4. Quantifiable

Actual Emission Reductions (AER) amounts were calculated from historic production and fuel usage records, source testing data, established and accepted emission factors, and methods according to District Rule 2201. Therefore, the reductions are quantifiable and have been quantified.

5. Enforceable

Operation of the equipment without a valid permit would subject the permittee to enforcement action. The PTOs for this facility have been cancelled and the cotton gin cannot be operated without a valid PTO.

Due to the size and complexity of the operation, the large bulk of the material processed, and the amount of lint, seeds, and waste material generated, it would be readily apparent
if it were to be operated in the future. Therefore, the emission reductions satisfy the enforceable requirement.

6. Not used for the Approval of an Authority to Construct or as Offsets

The emission reduction credits generated by the shutdown of a cotton gin and have not been used for the approval of any ATC or as offsets or mitigation. The permits have been cancelled.

The gin had undergone permitting under Rule 2201. The permit complied with all NSR requirements. No adjustments to the HAE are necessary under Rule 2201.

As stated before in this evaluation, pursuant to Section 3.23, HAE must be discounted for any emissions reduction which is:

- required or encumbered by any laws, rules, regulations, agreements, orders, or permits; and
- attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan (SIP), and
- proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act; and
- Any Actual Emissions in excess of those required or encumbered by any laws, rules, regulations, orders, or permits. For units covered by a Specific Limiting Condition (SLC), the total overall HAE for all units covered by SLC must be discounted for any emissions in excess of that allowed by the SLC.

1. There are no agreements or orders regarding the operation or emissions reductions associated with the equipment. The discounts for any Rules have been previously discussed under the applicable Rules.

2. There are no reductions that are attributed to a control measure noticed for workshop, or proposed or contained in a State Implementation Plan.

3. There are no reductions proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act.

4. There are no SLCs related to the operation of the cotton gin.

Rule 2301 Emission Reduction Credit Banking

Section 4.0 - Eligibility of Emission Reductions

Section 4.2, specifies the criteria by which emission reductions that have occurred after September 19, 1991, are eligible for banking. The emission reductions in this project occurred when the PTOs for the cotton ginning equipment was surrendered, effective October 23, 2018. As these emission reductions occurred after September 19, 1991, the criteria in Section 4.2 has been satisfied.
Section 4.2.1 requires that the emission reductions are real, surplus, permanent, quantifiable, and enforceable. Discussion of compliance with Section 4.2.1 requirements has been addressed under Rule 2201 above and it has been determined that the emission reductions meet the criteria of this section.

Section 4.2.2 requires that AER be calculated in accordance with the procedure in Rule 2201 (New and Modified Stationary Source Review Rule), including any adjustments for use of Community Bank offsets. As detailed in Section V - Calculations, the AER were calculated according to the procedure in Rule 2201 and the past permitting of the facility did not include Community Bank ERC. Therefore, the emission reductions satisfy the requirements of this section.

Section 4.2.3 requires that an application be filed no later than 180 days after the reduction occurred. The ERC banking application was filed on October 23, 2018, and the PTOs were surrendered on that same date. According to District Policy APR 1805, the date of the shutdown is considered to be the date on which the PTOs are surrendered, unless the equipment was removed or the District determines the owner did not intend to operate again. Since the District has no evidence that either of these were the case, the gin is considered to be operational at time of permit surrender. The application is considered timely and the requirement of this section is satisfied.

Section 4.2.4 applies to emissions from non-permitted units. The gin was permitted; therefore, this section is not applicable.

Section 4.3 applies to banking offsets which were provided for cancelled Authorities to Construct. These emissions were not previously banked so this section is not applicable.

Section 4.4 refers to source categories which are not eligible for ERC. The categories do not include gin shutdowns, so this section is not applicable.

Section 5.0 - ERC Certificate Application Procedures

This section states that ERC certificate applications for reductions shall be submitted within 180 days after the emission reduction occurs. The ERC banking application was filed and the PTOs were surrendered on October 23, 2018, and the operations at this location were permanently ceased effective June 29, 2018. Therefore, the application was submitted in a timely fashion.

Section 6.0 - Registration of ERC Certificates

The APCO may only grant an ERC Certificate after the emission reductions have actually occurred upon satisfaction of the following applicable provisions:

6.1.1 A revised Permit to Operate has been issued if the emission reductions were created as a result of greater operating efficiencies or from the application of more efficient control technology.
6.1.2 If the emission reductions were created as a result of the shutdown of a permitted emissions unit, the relevant Permit(s) to Operate has been surrendered and voided.

6.1.3 If the emission reductions from a permitted emissions unit were created by means of reducing production or production rates, the relevant Permit(s) to Operate have been modified to reflect the emission reductions.

6.1.4 If the emission reductions were created as a result of the application of greater operating efficiencies or from the application of a more efficient control technology to a then non-permitted source.

The permits to operate were surrendered along with the ERC application on October 23, 2018. All permits associated with this operation were cancelled on January 8, 2019.

Compliance with Rule 2301 has been demonstrated and no adjustments are required under this rule.

**Rule 4201 Particulate Matter Concentration**

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

According to Project S-1020246, previous source tests of this system have indicated that the emission rate is below the limit of 0.1 gr/dscf. Therefore, no adjustment is necessary for Rule 4201.

**Rule 4202 Particulate Matter - Emission Rate**

According to Project S-1020246, calculations on the particulate matter emission rate for each system (unloading, cleaners, overflow, ginstand trash, etc.) are below the allowable PM10 emissions. Therefore, no adjustment is necessary.

**Rule 4204 Cotton Gins**

The purpose of this rule is to limit PM10 emissions from cotton ginning facilities and to provide the administrative requirements for monitoring, recordkeeping, and source testing for these facilities.

Section 5.1 requires that all emission points shall be controlled by 1D3D cyclones or rotary drum filters, according to the compliance schedule in Section 7.0.

Since the cotton gin was served entirely by 1D-3D cyclones with 2D/2D inlets and expansion chamber trash outlet, and no other parts of this rule regulate permitted emissions, no adjustment is necessary.
VII. Recommendation

Pending a successful Public Noticing period, issue Emission Reduction Credits (ERCs) certificate to J.G. Boswell Company in accordance with the amounts specified on the draft ERC certificates in Appendix E.

Appendices:

A: Cancelled PTOs
B: PM$_{2.5}$ Fraction
C: Source Test Results
D: Emissions Inventory Reports
E: Draft ERC Certificates
Appendix A: Cancelled PTOs
Appendix B:
PM2.5 Fraction
Lint cleaners are the largest source of emissions from the cotton ginning process. Therefore, the PM$_{2.5}$ fraction of the PM$_{10}$ from lint cleaners is representative of the PM$_{2.5}$ fraction from the entire cotton gin. Based on the data in the chart above, the final PM$_{2.5}$ fraction is calculated to be:

$$PM_{2.5\text{Fraction}} = \frac{\frac{1\ lb\ PM_{2.5}}{lb\ PM}}{\frac{54\ lb\ PM_{10}}{lb\ PM}} \times 100\% = 1.851 \rightarrow 1.9\% \frac{PM_{2.5}}{PM_{10}}$$
Appendix C:
Source Test Results
Appendix D:
Emissions Inventory Reports
Appendix E:
Draft ERC Certificates
Appendix A:
Cancelled PTOs
PERMIT UNIT REQUIREMENTS

1. All machines/systems belonging to Gin #11 except the bale press shall be physically disconnected from their power source or rendered non-operational. [District Rule 4204]

2. None of the machines/systems belonging to Gin #11 except the bale press shall be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4204. [District Rule 4204]

3. Operation shall include 6 MMBtu/hr #1 heater, 3 MMBtu/hr #2 heater, 3 MMBtu/hr #3 heater and 1.5 MMBtu/hr Samuel Jackson moisturizer. [District Rule 2201]

4. Operation shall include 2 - 6 ft. horizontal screen cleaners, horizontal grid bar cleaner, 4 - 7 cylinder incline cleaners, 8 impact cleaners, 4 gin stands, 8 lint cleaners, 8 lint cleaner condensers, overflow system, battery condenser and bale press. [District Rule 2201]

5. Operation shall include motes handling system with 1 - 5 hp cleaner, 4" air line for motes cleaner trash, and 1 - 30 hp bale press. [District Rule 2201]

6. Operation shall include 1-150 hp unloading fans, 2-50 hp separator pull fans, 1-50 hp and 1-75 hp heater fans, 60 hp heater fan, and 2-40 hp incline cleaner pull fans, 50 hp overflow pull fan, 50 hp main trash fan, 40 hp master skimmer fan, 75 hp battery condenser fan, 25 hp moisturizer fan, 2-50 hp mote fans, 50 hp hot air pull fan, and 4-40 hp lint cleaner pull fans. [District Rule 2201]

7. Operation shall include slot skimmer serving module feeder and/or wagon suction assembly, 5 slot skimmers serving the 8 lint cleaners, and slot skimmer serving the battery condenser. [District Rule 2201]

8. Operation shall include 4-36 in. dia. 1D-3D cyclones serving overflow, main trash, and motes cleaner trash systems, 4-38 in. dia. 2D-2D cyclones serving incline cleaners, and 4-38 in. dia. 2D-2D cyclones serving separator pull fans, 4-38 in. dia. 2D-2D cyclones serving hot air pull fans, 2-60 in. dia. 2D-2D cyclones serving mote fans, 2-24 in. dia. 2D-2D cyclones serving seed lines, 1 1D-3D cyclone serving seed bin, and 1 1D-3D cyclone serving seed building. [District Rule 2201]

9. There shall be no baffles or other projections inside cyclones. [District Rule 2201]

10. Cotton gin trash shall be handled and disposed of in a manner preventing spontaneous ignition and/or fire hazard. [District Rule 2080]

11. Particulate matter (PM-10) emission rate for non-MAXXA variety shall not exceed 1.12 lb/equivalent 500 lb bale. PM10 emission rate for MAXXA variety shall not exceed 1.006 lb/equivalent 500 lb bale. [District Rule 2201]

12. PM10 emission rate shall not exceed 672 lb/day. [District Rule 2201]

13. Total combined PM10 emissions from permit units S-714-1 and "-2 shall not exceed 120,960 lbs per season. [District Rule 2201]
14. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

15. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

16. 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]

17. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]

18. Permittee shall maintain accurate records of amounts and varieties of cotton processed and calculated daily and cumulative season PM10 emissions each day and shall retain such records for a period of five years. Such records shall be made readily available to the District upon request. [District Rule 1070]
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-714-2-0               EXPIRATION DATE: 12/31/2021
SECTION: 12  TOWNSHIP: 32S  RANGE: 25E

EQUIPMENT DESCRIPTION:
18 MMBTU/HR ROLLER-TYPE COTTON GIN WITH MODULE FEEDER, TELESCOPE SUCTION, 4 TOWER DRYERS
WITH ONE 2 MMBTU/HR AND TWO 8 MMBTU/HR NATURAL GAS/LPG BURNERS, 8 CLEANERS, 4 STICK
MACHINES, 24 ROLLER GIN STANDS, OVERFLOW SYSTEM, 2 COMBING LINT CLEANERS, 2 AIR BLAST LINT
CLEANERS, BATTERY CONDENSER, AND NON-PNEUMATIC TRASH SYSTEM

PERMIT UNIT REQUIREMENTS

1. The #1 precleaner shall be controlled by two 71" 1D-3D cyclone collectors. [District Rule 2201]
2. The #2 precleaner shall be controlled by two 71" 1D-3D cyclone collectors. [District Rule 2201]
3. The overflow shall be controlled by two 50" 1D-3D cyclone collectors. [District Rule 2201]
4. The lint cleaner condensers shall be controlled by four 68" 1D-3D cyclone collectors. [District Rule 2201]
5. The gin stands shall be controlled by one 60" 1D-3D cyclone collector. [District Rule 2201]
6. The battery condenser shall be controlled by two 76" 1D-3D cyclone collectors. [District Rule 2201]
7. The telescope suction system shall be controlled by one 48" 1D-3D cyclone collector. [District Rule 2201]
8. Cotton gin dryers shall be fired on PUC-regulated natural gas or LPG only. [District Rule 2201]
9. Total combined emissions of PM10 from permit units S-714-1 and S-714-2 shall not exceed 120,960 lbs PM10 per season. [District Rule 2201]
10. No more than the equivalent of 20 bales per day and 100 bales per season shall be introduced to gin through the telescope suction system. [District Rule 2201]
11. Total PM10 emissions from this permit unit shall not exceed 1.07 lb PM10 per each equivalent 500 lb bale of cotton produced. [District Rule 2201]
12. Emissions of PM10 from rotolift system shall not exceed 0 lb/equivalent 500 lb bale. [District Rule 2201]
13. Emissions of PM10 from #1 precleaner cyclones shall not exceed 0.24 lb/equivalent 500 lb bale. [District Rule 2201]
14. Emissions of PM10 from #2 precleaner cyclones shall not exceed 0.24 lb/equivalent 500 lb bale. [District Rule 2201]
15. Emissions of PM10 for overflow system cyclones shall not exceed 0.06 lb/equivalent 500 lb bale. [District Rule 2201]
16. Emissions of PM10 from lint cleaner system cyclones shall not exceed 0.08 lb/equivalent 500 lb bale. [District Rule 2201]
17. Emissions of PM10 from gin stand cyclone shall not exceed 0.06 lb/equivalent 500 lb bale. [District Rule 2201]
18. Emissions of PM10 from battery condenser cyclones shall not exceed 0.1 lb/equivalent 500 lb bale. [District Rule 2201]
19. Emissions of PM10 from telescope suction system cyclone shall not exceed 0.23 lb/equivalent 500 lb bale. [District Rule 2201]

These terms and conditions are part of the Facility-wide Permit to Operate.
20. Emissions of PM10 from main trash system shall not exceed 0.06 lb/equivalent 500 lb bale. [District Rule 2201]

21. Dryer emissions rates shall not exceed any of the following: NOx: 0.1 lb/MMBtu, VOC: 0.006 lb/MMBtu, CO: 0.02 lb/MMBtu, PM10 0.01 lb/MMBtu, or SOx: 0.008 lb/MMBtu. [District Rule 2201]

22. District witnessed source testing to demonstrate compliance with PM10 emission limit shall be conducted on one 71" cyclone serving the 1st stage precleaner. [District Rule 1081]

23. District witnessed source testing to demonstrate compliance with PM10 emission limit shall be conducted on one 71" cyclone serving the 2nd stage precleaner. [District Rule 1081]

24. District witnessed source testing to demonstrate compliance with PM10 emission limit shall be conducted on one 50" cyclone serving the overflow. [District Rule 1081]

25. District witnessed source testing to demonstrate compliance with PM10 emission limit shall be conducted on one 76" cyclone serving the battery condenser. [District Rule 1081]

26. Source testing to measure PM and PM10 shall be conducted using EPA Methods 501 and 501A, respectively. [District Rule 1081]

27. Source testing shall be performed within 60 days of initial startup. [District Rule 1081]

28. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081]

29. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

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

31. Permittee shall maintain accurate records of amounts of cotton processed and calculated daily and cumulative season PM10 emissions each day. [District Rule 1070]

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

33. Records shall be maintained for a period of at least five years and made readily available for District inspection upon request. [District Rule 1070]
Appendix B:
PM2.5 Fraction
Lint cleaners are the largest source of emissions from the cotton ginning process. Therefore, the PM$_{2.5}$ fraction of the PM$_{10}$ from lint cleaners is representative of the PM$_{2.5}$ fraction from the entire cotton gin. Based on the data in the chart above, the final PM$_{2.5}$ fraction is calculated to be:

\[
PM_{2.5} \text{Fraction} = \frac{1 \text{ lb } PM_{2.5}}{\frac{1 \text{ lb } PM}{54 \text{ lb } PM_{10}} \times 100\%} = 1.851 \rightarrow 1.9\% \frac{PM_{2.5}}{PM_{10}}
\]
Appendix C: Source Test Results
### SUMMARY OF RESULTS

**J. G. Boswell Company**  
**Gin #10**  
**1st Stage Precleaning System**  

**Project 198-2780**  
**December 2, 2002**  
**ATC No. S-714-2-0**

<table>
<thead>
<tr>
<th>EMISSIONS</th>
<th>Single Cyclone</th>
<th>System lb/hr</th>
<th>System lb/500 lb bale</th>
<th>Permit Limit</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>gr/DSCF</td>
<td>gr/SCF</td>
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**Process Rate**  
**500 lb bale/hr**

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<td>Σ</td>
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**Comments:** System Emissions derived by multiplying single cyclone emissions by two.
# SUMMARY OF RESULTS

J. G. Boswell Company  
Gin #10  
Battery Condenser System  

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<td></td>
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**Process Rate**  
500 lb bale/hr  

| Process Conditions | 17.83 | 22.06 | 19.97 |

**Comments:** System Emissions derived by multiplying single cyclone emissions by two
## SUMMARY OF RESULTS

### J. G. Boswell Company
**Gin #10**
Overflow System

### Project Information
- **Project #:** 198-2780
- **Date:** December 4, 2002
- **ATC No.:** S-714-2-0

### Emissions Summary

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| % PM 10 | 65.0 | 69.0 | 77.0 |

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**Comments:** System Emissions derived by multiplying single cyclone emissions by two.
## J. G. Boswell Company
### Gin #10
#### 2nd Stage Precleneing System

### AEROS ENVIRONMENTAL, INC.
#### SUMMARY OF RESULTS

**Project 198-2780**  
December 5, 2002  
**ATC No. S-714-2-0**

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<td></td>
<td>gr/DSCF</td>
<td>gr/SCF</td>
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<td></td>
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<td>1.718</td>
<td>3.44</td>
</tr>
<tr>
<td><strong>Matter (PM)</strong></td>
<td>0.01445</td>
<td>0.01412</td>
<td>1.655</td>
<td>3.31</td>
</tr>
<tr>
<td><strong>Mean:</strong></td>
<td>0.01399</td>
<td>0.01372</td>
<td>1.610</td>
<td>3.22</td>
</tr>
<tr>
<td><strong>% PM 10</strong></td>
<td>50.0</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>PM 10</strong></td>
<td>0.00626</td>
<td>0.00618</td>
<td>0.729</td>
<td>1.46</td>
</tr>
<tr>
<td><strong>Mean:</strong></td>
<td>0.00670</td>
<td>0.00657</td>
<td>0.771</td>
<td>1.54</td>
</tr>
<tr>
<td><strong>0.24 lb/500 lb bale</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Comments:** System Emissions derived by multiplying single cyclone emissions by two

<table>
<thead>
<tr>
<th>Process Conditions</th>
<th>500 lb bale/hr</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>15.98</td>
</tr>
<tr>
<td></td>
<td>20.05</td>
</tr>
<tr>
<td></td>
<td>21.32</td>
</tr>
</tbody>
</table>
Appendix D:
Emissions Inventory Reports
**Emission Statement - Calendar Year 2008 Emissions**

**Check Box if Process Rates Are Confidential:**

<table>
<thead>
<tr>
<th>Device ID #</th>
<th>Process Number</th>
<th>Equipment Type</th>
<th>Yearly Process Rate</th>
<th>Units</th>
<th>NOx Lb / Unit</th>
<th>VOC Lb / Unit</th>
<th>SOx Lb / Unit</th>
<th>CO Lb / Unit</th>
<th>PM10 Lb / Unit</th>
<th>NH3 Lb / Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>Cotton Gin</td>
<td>0</td>
<td>BALES OF COTTON</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>30200406</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
</tr>
<tr>
<td>1</td>
<td>2</td>
<td>Natural Gas Combustion</td>
<td>0</td>
<td>MILLION CUBIC FEET BURNED</td>
<td>100.0</td>
<td>6.0</td>
<td>3.0</td>
<td>20.0</td>
<td>.0</td>
<td>.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3023590003</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
</tr>
<tr>
<td>2</td>
<td>1</td>
<td>Cotton Gin - Roller</td>
<td>51.20</td>
<td>BALES OF COTTON</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
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<td>.0</td>
<td>.0</td>
</tr>
<tr>
<td>2</td>
<td>2</td>
<td>Natural Gas-Fired Burners</td>
<td>13.20</td>
<td>MILLION CUBIC FEET BURNED</td>
<td>100.0</td>
<td>2.3</td>
<td>.6</td>
<td>21.0</td>
<td>4.5</td>
<td>.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3023590003</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
</tr>
</tbody>
</table>

**Totals For the Facility (TONS / YEAR):**

<table>
<thead>
<tr>
<th>NOx</th>
<th>VOC</th>
<th>SOx</th>
<th>CO</th>
<th>PM10</th>
<th>NH3</th>
</tr>
</thead>
<tbody>
<tr>
<td>.07</td>
<td>.02</td>
<td>.0</td>
<td>.01</td>
<td>.03</td>
<td>.0</td>
</tr>
</tbody>
</table>

**Please Note:** Emissions for NH3 are reported in Lbs / Year.

---

**Contact:**
- **Name:** DENNIS TRISTAO
- **Company:** JG BOSWELL COMPANY
- **Address:** P O BOX 457
- **City, State, Zip:** CORCORAN, CA 93212
- **Telephone:** (559) 992 - 2141
- **Email:**
- **Location of facility if different from above:** 31500 SOUTH LAKE ROAD

**Name and Title of Responsible Official:**

I certify that the information contained in the Emission Statement is accurate to the best of my knowledge.

---

**Reporting by Calendar Year**

(please see attached spreadsheet)

This data was taken from last year's emissions inventory data. Please make any correction to this document in red ink.
### Emission Statement - Calendar Year 2009 Emissions

Please Sign and Return to:
San Joaquin Valley Unified APCD
1990 East Gettysburg Avenue
Fresno, CA 93726

**Device ID #** | **TAD #** | **SIC** | **Facility Name** | **TOXID #** | **Planning Inventory** | **Update Summary**
--- | --- | --- | --- | --- | --- | ---
S-714 | 15 - 714 | 724 | JG BOSWELL COMPANY | 0 | Electronic | ☐
S-1103776 | 115111 | Permits Srvc | SJVAPCD |

**CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL:** ☑

<table>
<thead>
<tr>
<th>Device ID #</th>
<th>Process Number</th>
<th>Equipment Type</th>
<th>Yearly Process Rate</th>
<th>Units</th>
<th>NOx Lb / Unit</th>
<th>VOC Lb / Unit</th>
<th>SOx Lb / Unit</th>
<th>CO Lb / Unit</th>
<th>PM10 Lb / Unit</th>
<th>NH3 Lb / Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>Cotton Gin</td>
<td>0</td>
<td>BALES OF COTTON</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>1.12</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>Natural Gas Combustion</td>
<td>0</td>
<td>MILLION CUBIC FEET BURNED</td>
<td>100.0</td>
<td>6.0</td>
<td>3.0</td>
<td>20.0</td>
<td>.0</td>
<td>.0</td>
</tr>
<tr>
<td>2</td>
<td>1</td>
<td>Cotton Gin - Roller</td>
<td>84,020</td>
<td>BALES OF COTTON</td>
<td>.0</td>
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<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>1.07</td>
</tr>
<tr>
<td>2</td>
<td>2</td>
<td>Natural Gas-Fired Burners</td>
<td>182-1,291</td>
<td>MILLION CUBIC FEET BURNED</td>
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<td>2.3</td>
<td>6.0</td>
<td>21.0</td>
<td>.4</td>
<td>.0</td>
</tr>
</tbody>
</table>

Please Note: Emissions for NH3 are reported in Lbs / Year.

---

REPORTING BY CALENDAR YEAR

This data was taken from last year's emissions inventory data. Please make any correction to this document in red ink.

Last Updated By BOTILLB
## Emission Statement - Calendar Year 2010 Emissions

**J.G. BOSWELL COMPANY**

Please Sign and return to:
San Joaquin Valley Unified APCD
1990 East Gettysburg Avenue
Fresno, CA 93726

**UTM**

Zone: 11
East: 296.724
North: 3892.77

**Check Box if Process Rates are Confidential:**

<table>
<thead>
<tr>
<th>Device ID #</th>
<th>Process Number</th>
<th>Equipment Type</th>
<th>Yearly Process Rate</th>
<th>Units</th>
<th>NOX lb/Unit</th>
<th>VOC lb/Unit</th>
<th>SOX lb/Unit</th>
<th>CO lb/Unit</th>
<th>PM10 lb/Unit</th>
<th>NH3 lb/Unit</th>
<th>Tons/Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>Cotton Gin - Bales</td>
<td>0.00</td>
<td></td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>1</td>
<td>2</td>
<td>Natural Gas Combustion - Heaters</td>
<td>0.00</td>
<td></td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>1</td>
<td>Cotton Gin - Bales</td>
<td>4699.00</td>
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<td>0.00</td>
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<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
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<td>2</td>
<td>Natural Gas Combustion - Heaters</td>
<td>19.32</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Totals For the Facility (Tons/Year)**

<table>
<thead>
<tr>
<th>Tons/Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.97</td>
</tr>
<tr>
<td>0.06</td>
</tr>
<tr>
<td>0.08</td>
</tr>
<tr>
<td>0.19</td>
</tr>
<tr>
<td>26.42</td>
</tr>
</tbody>
</table>

**Contact:** DENNIS TRISTAO  
**Company:** J.G. BOSWELL COMPANY  
**Address:** PO BOX 457  
**City,State,Zip:** CORCORAN, CA 93212  
**Telephone:** (559) 992-2141  
**Email Address:** ccurtis@jgboswell.com  
**Location of Facility if different from above:** J.G. BOSWELL COMPANY  
**Address:** 710 BAINUM AVE
**J.G. BOSWELL COMPANY**

**Emission Statement - Calendar Year 2011 Emissions**

**Check Box If Process Rates are Confidential:**

Y

<table>
<thead>
<tr>
<th>Process Rate</th>
<th>Equipment Type</th>
<th>NOx Lb/Unit</th>
<th>VDC Lb/Unit</th>
<th>SOx Lb/Unit</th>
<th>CO Lb/Unit</th>
<th>PM10 Lb/Unit</th>
<th>NH3 Lb/Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Cotton Gin - Bales</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>Natural Gas Combustion - Heaters</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
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<td>Cotton Gin - Rotor - Bales</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>Natural Gas Combustion - Heaters</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Facility ID #:** S-714
**TAD #:** 15-714
**SIC #:** 724
**Facility Name:** JG BOSWELL COMPANY
**Toxic ID #:**

**FACILITY WIDE RELATIVE MONTHLY ACTIVITY**

If the facility has the same operating schedule year round, then check the Default Monthly Activity box. Otherwise, provide the percentage and months the facility operates. Note: The total percentage for the year must add up to 100%.

<table>
<thead>
<tr>
<th>JAN</th>
<th>FEB</th>
<th>MAR</th>
<th>APR</th>
<th>MAY</th>
<th>JUN</th>
<th>JUL</th>
<th>AUG</th>
<th>SEP</th>
<th>OCT</th>
<th>NOV</th>
<th>DEC</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
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<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
</tr>
</tbody>
</table>

**Relative Monthly Activity:**

<table>
<thead>
<tr>
<th>JAN</th>
<th>FEB</th>
<th>MAR</th>
<th>APR</th>
<th>MAY</th>
<th>JUN</th>
<th>JUL</th>
<th>AUG</th>
<th>SEP</th>
<th>OCT</th>
<th>NOV</th>
<th>DEC</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

**Daily Activity**

Please indicate normal operating schedule:

<table>
<thead>
<tr>
<th>Number of hours worked each day:</th>
<th>24</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sunday</td>
<td>0</td>
</tr>
<tr>
<td>Monday</td>
<td>0</td>
</tr>
<tr>
<td>Tuesday</td>
<td>0</td>
</tr>
<tr>
<td>Wednesday</td>
<td>0</td>
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<tr>
<td>Thursday</td>
<td>0</td>
</tr>
<tr>
<td>Friday</td>
<td>0</td>
</tr>
<tr>
<td>Saturday</td>
<td>0</td>
</tr>
</tbody>
</table>

*Page 1 of 1*
Emission Statement - Calendar Year 2012 Emissions; Corrected 2013 April 8

Please return to:
San Joaquin Valley Unified APCD
1990 East Gettysburg Avenue
Fresno, CA 93726
or FAX: (559) 230 - 6061

Facility ID # : S-714
TAD # : 15-714
SIC : 724
Facility Name : J G BOSWELL COMPANY
Toxic ID # : 2

Check Box If Process Rates are Confidential : Y

<table>
<thead>
<tr>
<th>Device ID #</th>
<th>Process Number</th>
<th>Equipment Type</th>
<th>Yearly Process Rate</th>
<th>Units of Emission</th>
</tr>
</thead>
<tbody>
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<td>1</td>
<td>1</td>
<td>Cotton Gin - Bales</td>
<td>0.00</td>
<td>NOX</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>BALES OF COTTON</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.00</td>
</tr>
<tr>
<td>1</td>
<td>2</td>
<td>Natural Gas Combustion - Heaters</td>
<td>0.00</td>
<td>VOC</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>MILLION CUBIC FEET BURNED</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>1</td>
<td>Cotton Gin - Roller - Bales</td>
<td>65,025</td>
<td>SOX</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>BALES OF COTTON</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>2</td>
<td>Natural Gas Combustion - Heaters</td>
<td>16.93</td>
<td>CO</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>MILLION CUBIC FEET BURNED</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>0.00</td>
</tr>
</tbody>
</table>

Totals For the Facility (Tons/Year):

<table>
<thead>
<tr>
<th>NOX</th>
<th>VOC</th>
<th>SOX</th>
<th>CO</th>
<th>PM10</th>
<th>NH3</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
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<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>1.07</td>
<td>0.00</td>
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<tr>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>34.79</td>
<td>0.00</td>
</tr>
<tr>
<td>0.86</td>
<td>0.05</td>
<td>0.07</td>
<td>0.17</td>
<td>34.79</td>
<td>0.00</td>
</tr>
</tbody>
</table>

* Please Note: Emissions for NH3 are reported in Lbs / Year.

Contact: DENNIS TRISTAO
Company: J G BOSWELL COMPANY
Address: P. O. BOX 457
City, State, Zip: CORCORAN, CA 93212
Telephone: (559) 9922141

Email Address
Location of facility if different from above: 31500 SOUTH LAKE ROAD, BAKERSFIELD

1 of 2

2012 PTO S-714 TAD Wsksheet-CORRECTED 2013 April 8_ CC.xls
## Emission Inventory - Calendar Year 2013 Statement

**Facility ID:** S-714  
**TAD:** 15-714  
**SIC:** 724  
**Facility Name:** J G BOSWELL COMPANY  
**Toxic ID:** 0

### Confidential Process Rates:
- **YES**

*Please Note: Emissions for NH3 are reported in Lbs / Year*

<table>
<thead>
<tr>
<th>Device ID #</th>
<th>Process Number</th>
<th>Equipment Type</th>
<th>Yearly Process Rate</th>
<th>Source Classification Code</th>
<th>NOX Lb / Unit</th>
<th>VOC Lb / Unit</th>
<th>SOX Lb / Unit</th>
<th>CO Lb / Unit</th>
<th>PM10 Lb / Unit</th>
<th>NH3* Lb / Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>Cotton Gin - Bales</td>
<td>0.00</td>
<td>BALES OF COTTON</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>1.12</td>
<td>0.00</td>
</tr>
<tr>
<td>1</td>
<td>2</td>
<td>Natural Gas Combustion - Heaters</td>
<td>0.00</td>
<td>MILLION CUBIC FEET BURNED</td>
<td>100.00</td>
<td>6.00</td>
<td>3.00</td>
<td>20.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>1</td>
<td>Cotton Gin - Roller - Bales</td>
<td>56657.00</td>
<td>BALES OF COTTON</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>1.07</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>2</td>
<td>Natural Gas Combustion - Heaters</td>
<td>14.07</td>
<td>MILLION CUBIC FEET BURNED</td>
<td>102.60</td>
<td>6.16</td>
<td>8.21</td>
<td>20.52</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

**Totals For the Facility (Tons / Year):**
- NOX: 72.04
- VOC: 0.40
- SOX: 0.06
- CO: 0.14
- PM10: 30.32
- NH3*: 0.00

### Contact
- **Dennis Tristao**
- **J G BOSWELL COMPANY**
- **P O BOX 457**
- **CORCORAN, CA 93212**
- **(559) 992-2141**
- **ccurtis@jgboswell.com**

### Name and Title of Responsible Official
- **Name:**
- **Title:**

**Location of facility if different from above**
- **31500 SOUTH LAKE ROAD**
- **BAKERSFIELD, CA 93311**

*By checking this box, I certify that the information contained in the Emissions Survey is accurate to the best of my knowledge.*
Emission Statement - Calendar Year 2014 Emissions

Please return to:
San Joaquin Valley Unified APCD
1990 East Getzburg Avenue
Fresno, CA 93726
or FAX (559) 230 - 6081

Check Box If Process Rates are Confidential:

<table>
<thead>
<tr>
<th>Device ID #</th>
<th>Process Number</th>
<th>Equipment Type</th>
<th>Yearly Process Rate</th>
<th>Source Classification Code</th>
<th>NOx LB/Unit</th>
<th>VOC LB/Unit</th>
<th>SOX LB/Unit</th>
<th>CO LB/Unit</th>
<th>PM10 LB/Unit</th>
<th>NH3 LB/Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>Cotton Gin - Bales</td>
<td>0.00</td>
<td>BALES OF COTTON</td>
<td>.00</td>
<td>.00</td>
<td>.00</td>
<td>.00</td>
<td>1.12</td>
<td>.00</td>
</tr>
<tr>
<td>1</td>
<td>2</td>
<td>Natural Gas Comb. - Heaters</td>
<td>0.00</td>
<td>MILLION CUBIC FEET BURNED</td>
<td>.00</td>
<td>.00</td>
<td>.00</td>
<td>.00</td>
<td>20.00</td>
<td>.00</td>
</tr>
<tr>
<td>2</td>
<td>1</td>
<td>Cotton Gin - Roller - Bales</td>
<td>3747.00</td>
<td>BALES OF COTTON</td>
<td>.00</td>
<td>.00</td>
<td>.00</td>
<td>.00</td>
<td>1.07</td>
<td>.00</td>
</tr>
<tr>
<td>2</td>
<td>2</td>
<td>Natural Gas Comb. - Heaters</td>
<td>8.34</td>
<td>MILLION CUBIC FEET BURNED</td>
<td>.00</td>
<td>.00</td>
<td>.00</td>
<td>.00</td>
<td>20.05</td>
<td>.00</td>
</tr>
</tbody>
</table>

Totals For the Facility (Tons/Year): 0.43 0.03 0.03 0.09 20.05 0.00

Contact
Dennis Tristao
Company: J. G. Boswell Company
Address: P.O. Box 457
City, State, Zip: CORDOAR, CA 93212
Telephone: (559) 922-2141
Email Address:

Location of facility
31500 S. LAKE RD

FACILITY WIDE RELATIVE MONTHLY ACTIVITY

If the facility has the same operating schedule year round, then check the Default Monthly Activity box. Otherwise, provide the percentage and months the facility operates. Note: The total percentage for the year must add up to 100%.

<table>
<thead>
<tr>
<th>JAN</th>
<th>FEB</th>
<th>MAR</th>
<th>APR</th>
<th>MAY</th>
<th>JUN</th>
<th>JUL</th>
<th>AUG</th>
<th>SEP</th>
<th>OCT</th>
<th>NOV</th>
<th>DEC</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
<td>8.33</td>
</tr>
</tbody>
</table>

DEFAULT MONTHLY RELATIVE MONTHLY

Daily Activity
Please indicate normal operating schedule:

Number of hours worked each day:

24
24
24
24
24
24
24
24
24
24
24
24

Sunday
Monday
Tuesday
Wednesday
Thursday
Friday
Saturday
# Emission Statement - Calendar Year 2015 Emissions

Please return to:
San Joaquin Valley Unified APCD
1990 East Gettysburg Avenue
Fresno, CA 93726
or FAX: (559) 230 - 6061

**UTM**
- Zone: 11
- East: 296,17317
- North: 3892,3343

**Check Box If Process Rates are Confidential:**

<table>
<thead>
<tr>
<th>Device ID #</th>
<th>Process Number</th>
<th>Equipment Type</th>
<th>Yearly Process Rate</th>
<th>Source Classification Code</th>
<th>NOx lb / Unit</th>
<th>VOC lb / Unit</th>
<th>SOX lb / Unit</th>
<th>CO lb / Unit</th>
<th>PM10 lb / Unit</th>
<th>NH3 lb / Unit</th>
<th><strong>Units</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>Cotton Gin - Bales</td>
<td>0.00</td>
<td>BALES OF COTTON</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>1.12</td>
<td>0.00</td>
<td>Tons/Yr.</td>
</tr>
<tr>
<td>1</td>
<td>2</td>
<td>Natural Gas Combustion - Heaters</td>
<td>0.00</td>
<td>MILLION CUBIC FEET BURNED</td>
<td>100.00</td>
<td>6.00</td>
<td>3.00</td>
<td>20.00</td>
<td>0.00</td>
<td>0.00</td>
<td>Tons/Yr.</td>
</tr>
<tr>
<td>2</td>
<td>1</td>
<td>Cotton Gin - Roller - Bales</td>
<td>13318.00</td>
<td>BALES OF COTTON</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>1.07</td>
<td>0.00</td>
<td>Tons/Yr.</td>
</tr>
<tr>
<td>2</td>
<td>2</td>
<td>Natural Gas Combustion - Heaters</td>
<td>3.71</td>
<td>MILLION CUBIC FEET BURNED</td>
<td>104.69</td>
<td>6.28</td>
<td>8.38</td>
<td>20.94</td>
<td>0.00</td>
<td>0.00</td>
<td>Tons/Yr.</td>
</tr>
</tbody>
</table>

**Contact**
- Dennis Tristao
- J G BOSWELL COMPANY
- P O BOX 457
- CORCORAN, CA 93212
- (559) 992-2141

**Telephone**

**Email Address**

**Location of facility if different from above**
- 31500 S LAKE RD
- BAKERSFIELD

*Please Note: Emissions for NH3 are reported in Lbs / Year.*

**Totals For the Facility (Tons/Year)**
- 0.194
- 0.012
- 0.016
- 0.039
- 7.125
- 0.000
Emission Statement - Calendar Year 2016 Emissions

Please return to:
San Joaquin Valley Unified APCD
1990 East Gettysburg Avenue
Fresno, CA 93726
or FAX (559) 230-6061

Check Box If Process Rates are Confidential:

<table>
<thead>
<tr>
<th>Device ID #</th>
<th>Process Number</th>
<th>Equipment Type</th>
<th>Yearly Process Rate</th>
<th>Units</th>
<th>NOX lb/Unit</th>
<th>VOC lb/Unit</th>
<th>SOX lb/Unit</th>
<th>CO lb/Unit</th>
<th>PM10 lb/Unit</th>
<th>NH3 lb/Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>Colton Gin - Bales - Dormant</td>
<td>0.00</td>
<td>BALES OF COTTON</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>1.12</td>
<td>0.00</td>
</tr>
<tr>
<td>1</td>
<td>2</td>
<td>Total 13.5 MMBluhrs Heaters - NG - Dormant</td>
<td>0.00</td>
<td>MILLION CUBIC FEET BURNED</td>
<td>100.00</td>
<td>0.00</td>
<td>3.00</td>
<td>20.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>1</td>
<td>Colton Gin - Roller - Bales of Cottoon</td>
<td>25724.00</td>
<td>BALES OF COTTON</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>1.07</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>2</td>
<td>Total 18 MMBluhrs Heaters - LPG</td>
<td>7.64</td>
<td>MILLION CUBIC FEET BURNED</td>
<td>103.30</td>
<td>0.20</td>
<td>8.26</td>
<td>20.66</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>2</td>
<td>3</td>
<td>Total 18.6 MMBluhrs Heaters - LPG</td>
<td>9.05</td>
<td>1000 GALLONS BURNED</td>
<td>9.05</td>
<td>0.54</td>
<td>0.72</td>
<td>1.81</td>
<td>0.91</td>
<td>0.00</td>
</tr>
</tbody>
</table>

Totals For the Facility (Tons/Year): 0.395 0.024 0.032 0.079 13.762 0.000

* Please Note: Emissions for NH3 are reported in Lbs / Year.

Contact: Dennis Tristao
Company: J G BOSWELL COMPANY
Address: P O BOX 457
City, State, Zip: CORCORAN, CA 93212
Telephone: (559) 992-2141
Email Address: dtristao@gboswell.com
Location of Facility: 31500 S LAKE RD BAKERSFIELD

Facility ID #: S-714
TAD #: 15-714
SIC: 724
Facility Name: J G BOSWELL COMPANY
Toxic ID #: 0
# Emission Statement - Calendar Year 2017 Emissions

**Date / Time Printed:** 07/11/2018 / 3:48:03 PM  
**Facility ID #:** S - 714  
**TAD #:** 15 - 714  
**SIC #:** 724  
**Facility Name:** J G BOSWELL COMPANY  
**TOXID #:** 0  
**Planning Inventory / Electronic:**  

## CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL:

<table>
<thead>
<tr>
<th>Device ID #</th>
<th>Process Number</th>
<th>Equipment Type</th>
<th>Yearly Process Rate</th>
<th>Units Source Classification Code</th>
<th>NOX Lb / Unit</th>
<th>VOC Lb / Unit</th>
<th>SOX Lb / Unit</th>
<th>CO Lb / Unit</th>
<th>PM10 Lb / Unit</th>
<th>NH3* Lb / Unit</th>
<th>Note: NH3 emissions are in lbs / yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1</td>
<td>COTTON GIN - BALES - DORMANT</td>
<td>0</td>
<td>BALES OF COTTON</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>1.12</td>
<td>.0</td>
<td>.0</td>
<td>(Tons/yr)</td>
</tr>
<tr>
<td>1</td>
<td>2</td>
<td>TOTAL 13.5 MMBTU/HR HEATERS - NG - DORMANT</td>
<td>0</td>
<td>MILLION CUBIC FEET BURNED</td>
<td>10.0</td>
<td>6.0</td>
<td>3.0</td>
<td>20.0</td>
<td>.0</td>
<td>.0</td>
<td>(Tons/yr)</td>
</tr>
<tr>
<td>2</td>
<td>1</td>
<td>COTTON GIN - ROLLER - BALES OF COTTON</td>
<td>24937</td>
<td>BALES OF COTTON</td>
<td>.0</td>
<td>.0</td>
<td>.0</td>
<td>1.07</td>
<td>.0</td>
<td>.0</td>
<td>(Tons/yr)</td>
</tr>
<tr>
<td>2</td>
<td>2</td>
<td>TOTAL 18 MMBTU/HR HEATERS - NG</td>
<td>6.59</td>
<td>MILLION CUBIC FEET BURNED</td>
<td>102.43</td>
<td>6.15</td>
<td>8.2</td>
<td>20.49</td>
<td>.0</td>
<td>.0</td>
<td>(Tons/yr)</td>
</tr>
<tr>
<td>2</td>
<td>3</td>
<td>TOTAL 18.0 MMBTU/HR HEATERS - LPG</td>
<td>0</td>
<td>1000 GALLONS BURNED</td>
<td>.95</td>
<td>.54</td>
<td>.72</td>
<td>1.81</td>
<td>.91</td>
<td>.0</td>
<td>(Tons/yr)</td>
</tr>
</tbody>
</table>

**Totals For the Facility (Tons / Year):** 0.34 0.02 0.03 0.07 13.34 0.0

---

**Contact:** Dennis Tristao  
**Company:** J G BOSWELL CO  
**Address:** PO BOX 457  
**City, State, Zip:** CORCORAN, CA 93212  
**Telephone:** (559) 992-2141  
**Email:** dtristao@jgboswell.com

---

**Name and Title of Responsible Official:**  
**I certify that the information contained in the Emission Statement is accurate to the best of my knowledge.**  
**Signature of Responsible Official and Date:**

---

**Note:** This data was taken from last year's emissions inventory data. Please update this sheet with this year's data.
San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

Emission Reduction Credit Certificate
S-5079-1

ISSUED TO: J G BOSWELL CO
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 31500 S LAKE RD
BAKERSFIELD, CA

For VOC Reductions In The Amount Of:

<table>
<thead>
<tr>
<th>Quarter 1</th>
<th>Quarter 2</th>
<th>Quarter 3</th>
<th>Quarter 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td>None</td>
<td>None</td>
<td>60 lbs</td>
</tr>
</tbody>
</table>

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

Shutdown of cotton gin facility

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

Samir Sheikh, Executive Director / APCO
Arnaud Marjollet, Director of Permit Services
San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 34948 Flyover Court • Bakersfield, CA 93308

Emission Reduction Credit Certificate
S-5079-2

ISSUED TO: J G BOSWELL CO
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 31500 S LAKE RD

BAKERSFIELD, CA

For NOx Reductions In The Amount Of:

<table>
<thead>
<tr>
<th>Quarter 1</th>
<th>Quarter 2</th>
<th>Quarter 3</th>
<th>Quarter 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td>None</td>
<td>None</td>
<td>1,035 lbs</td>
</tr>
</tbody>
</table>

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

Shutdown of cotton gin facility

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

Samir Sheikh, Executive Director/SAPCO

Arnaud Marjollet, Director of Permit Services
San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

Emission Reduction Credit Certificate
S-5079-3

ISSUED TO: J G BOSWELL CO
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 31500 S LAKE RD

BAKERSFIELD, CA

For CO Reductions In The Amount Of:

<table>
<thead>
<tr>
<th>Quarter 1</th>
<th>Quarter 2</th>
<th>Quarter 3</th>
<th>Quarter 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td>None</td>
<td>None</td>
<td>199 lbs</td>
</tr>
</tbody>
</table>

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

Shutdown of cotton gin facility

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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

Emission Reduction Credit Certificate
S-5079-4

ISSUED TO:  J G BOSWELL CO
ISSUED DATE:  <DRAFT>
LOCATION OF REDUCTION:  31500 S LAKE RD
                         BAKERSFIELD, CA

For PM10 Reductions In The Amount Of:

<table>
<thead>
<tr>
<th>Quarter 1</th>
<th>Quarter 2</th>
<th>Quarter 3</th>
<th>Quarter 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td>None</td>
<td>None</td>
<td>35,587 lbs</td>
</tr>
</tbody>
</table>

Portion of above PM10 Reductions that is PM2.5:

<table>
<thead>
<tr>
<th>Quarter 1</th>
<th>Quarter 2</th>
<th>Quarter 3</th>
<th>Quarter 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.0%</td>
<td>0.0%</td>
<td>0.0%</td>
<td>1.9%</td>
</tr>
<tr>
<td>None</td>
<td>None</td>
<td>None</td>
<td>676 lbs</td>
</tr>
</tbody>
</table>

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

Shutdown of cotton gin facility

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

Samir Sheikh, Executive Director / ARCO
Arnaud Marlolet, Director of Permit Services
San Joaquin Valley
Air Pollution Control District

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308

Emission Reduction Credit Certificate
S-5079-5

ISSUED TO: J G BOSWELL CO
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 31500 S LAKE RD
BAKERSFIELD, CA

For SOx Reductions In The Amount Of:

<table>
<thead>
<tr>
<th>Quarter 1</th>
<th>Quarter 2</th>
<th>Quarter 3</th>
<th>Quarter 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td>None</td>
<td>None</td>
<td>91 lbs</td>
</tr>
</tbody>
</table>

Method Of Reduction

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

Shutdown of cotton gin facility

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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services