

**San Joaquin Valley
Unified Air Pollution Control District**

Cotton Gin Permit Processing

Approved By: _____ <i>Signed</i> _____ Seyed Sadredin Director of Permit Services	Date Revised: <u>7/17/97</u>
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Purpose: To streamline permitting requirements for cotton gins.

I. Applicability

This policy applies to:

- A. All Authority to Construct (ATC) applications for new or modified cotton ginning operations.
- B. Revising cotton gin permit conditions upon permit renewal.

II. Priority Processing

Cotton gin modification applications are to receive high priority status, upon request, during the months of May through December. These are the months before and during the ginning season, when quick permit turn-around may be crucial to a gin's successful ginning season. ATCs for new or modified sources at cotton ginning facilities will be issued within 30 days of receipt of a complete application, when the applicant requests priority processing, unless public noticing requirements are triggered. In turn, the ginners are asked to prepare and submit applications as early as possible, and to request priority processing only when absolutely necessary.

III. Permitting Requirements

District Policy SSPP 17 establishes guidelines for cotton ginners and District staff with respect to permitting requirements for various types of modifications or other actions at cotton gins.

IV. Supplemental Application Forms

Attached are two Supplemental Application Forms developed in conjunction with the California Cotton Ginners Association (CCGA); one for use when a gin is applying for an ATC to install control equipment, and one for use when a gin is applying for ERCs. These forms were developed in response to CCGA's request for industry-standard application forms, and should reduce the work required by both the District and the ginners.

Each form is to be submitted with a completed standard ATC or ERC application form.

V. Standardized Permits

Also attached is a standardized Permit to Operate (PTO) which must be used as a guide for all new cotton gin permits. Existing permits are also to be re-written to follow this new format upon permit renewal, as time allows. This will result in uniform permits and uniform requirements throughout the District. Note that the equipment description and conditions are in the format specified in District Policy SSPP 17.

It is important to note that this standardized permit is generic in nature, and therefore cannot contain all conditions that may be necessary to ensure compliance with all requirements, specifically New and Modified Source Review requirements which may appear on new Authorities to Construct (ATCs). For this reason, it may be necessary to place additional site-specific conditions on a permit which are not represented on this standardized permit.

VI. Testing Policy

The District and the CCGA jointly maintain a compilation of source test data from PM-10 tests performed on cotton gins in the San Joaquin Valley. This compilation is called the Cotton Gin Emission Factor Handbook, and is updated annually by the CCGA with data from the previous year's cotton gin source tests. While tremendous data has been compiled, there currently remains a need to fill the remaining data gaps.

On the other hand, PM-10 testing generally costs about \$3000-4000 per emission point, with a small discount for multiple tests at one location. This means that the

testing could cost more than the cyclone being tested (the most common size 1D-3D cyclone, 38 inch diameter, can be purchased new for less than \$1400, and smaller ones are even less expensive). The District recognizes that requiring excessive source testing may cause ginners to replace old inefficient cyclones with identical replacements rather than with more efficient 1D-3D cyclones, thus avoiding source testing costs at the expense of air quality. Alternatively, ginners may delay the retrofitting of gins with better control equipment as long as possible, again at the expense of air quality.

Therefore, to encourage the retrofitting of gins with cleaner cyclones, the District is requiring that only 50% of modified systems be tested, under the following guidelines:

1. One cyclone from 50% of the modified systems shall be tested, with half numbers of cyclones rounded up (i.e., if seven systems are modified, 4 cyclones are to be tested).
2. If only one or two systems are modified, one cyclone from each system is to be tested.

These testing requirements are summarized below:

# of systems modified	# of cyclones to be tested
one	one
2, 3 or 4	two
5 or 6	three
7 or 8	four
etc.	etc.

3. The District reserves the right to specify the systems to be tested. The specific systems to be tested may be listed in the applicable Authority to Construct, or will be specified by the District, in writing, within 5 working days after the submittal of the ginner's source test plan.

This testing policy will be used for determining compliance with permit conditions and for the determination of available ERCs. Those systems not tested will be assumed to be emitting at the rates specified in the District's application review.

This testing may be waived by the District provided the proposed modification results in a reduced potential to emit, and no emission reduction credits or production increases are requested.