



JUN 19 2018

Scott Skinner
Alta Vista Gin/ Murrieta Farm
10935 S Turner Island
Dos Palos, CA 93620

Re: Notice of Preliminary Decision – Emission Reduction Credits
Facility Number: C-27
Project Number: C-1171943

Dear Mr. Skinner:

Enclosed for your review and comment is the District's analysis of Alta Vista Gin/ Murrieta Farm's application for Emission Reduction Credits (ERCs) resulting from the shut down of the cotton gin, at 5854 S San Diego, Mendota. The quantity of ERCs proposed for banking is 4th quarter: 171 lb-NO_x, 19 lb-SO_x, 7,858 lb-PM₁₀, 24 lb-CO, and 6 lb-VOC; and 79 metric tons-CO₂e/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 Mr. Thom Maslowski of Permit Services at (559) 230-5906.

Sincerely,



Arnaud Marjollet
Director of Permit Services

AM:TM

Enclosures

cc: Chris McGlothlin, CCGGA via email
cc: Tung Le, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

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
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

**Emission Reduction Credit Banking
Application Review
Shutdown of a Cotton Ginning Operation**

Facility Name: Alta Vista Gin/
Murrieta Farm
Mailing Address: 10935 S Turner Island
Dos Palos, CA 93620
Processing Engineer: Thom Maslowski
Lead Engineer: Joven Refuerzo
Date: May 31, 2018

Primary Contact: Scott Skinner
Phone: (209) 827-7700

Facility Location: 5854 S San Diego
Mendota, CA 93640

Deemed Complete: August 07, 2017
Facility: C-27
Project Number: C-1171943

I. Summary

Alta Vista Gin/Murrieta Farm (Alta Vista Gin) operated a cotton ginning facility in Mendota, CA. On June 2, 2017, the District received an application from the operator who surrendered the Permit to Operate, C-27-1-3, for the cotton gin and requested Emission Reduction Credits (ERCs) for VOC, NO_x, CO, PM₁₀, SO_x, and CO_{2e}. A copy of the surrendered Permit to Operate (PTO) is attached (Attachment A) and the permit has been cancelled. During the last season of operation in 2016, the facility processed 11,807 bales of cotton.

Based on the historical operating data prior to the shutdown taken from the District's Emission Inventory, the amounts of bankable ERCs (as calculated in Section V of this document) are shown in the table below. The calculations in Section V are according to the provisions of District Rules 2201 and 2301.

Bankable Emissions Reductions Credits (ERCs)				
Pollutant	1st Qtr ERC (lb/qtr)	2nd Qtr ERC (lb/qtr)	3rd Qtr ERC (lb/qtr)	4th Qtr ERC (lb/qtr)
NO _x	0	0	0	171
SO _x	0	0	0	19
PM ₁₀	0	0	0	7,858
CO	0	0	0	24
VOC	0	0	0	6

The District is also proposing to issue the Greenhouse Gas (GHG) ERCs for carbon dioxide equivalent (CO_{2e}). The amount of bankable CO_{2e} emissions, shown in the table below, are calculated in Section V of this document according to the provisions of District Rules 2201 and 2301.

Bankable GHG Emissions	
Pollutant	ERC (metric tons/year)
CO ₂ e	79

II. Applicable Rules

Rule 2301 - Emission Reduction Credit Banking (Last amended 1/19/12)

III. Location of Reductions

Physical location of equipment: 5854 S San Diego, Mendota in Fresno County, CA.

IV. Method of Generating Reductions

The AER's were generated by shutting down a cotton gin. The equipment description for the unit is as follows:

C-27-1-3: COTTON GIN WITH TRUCK UNLOADING, COTTON DRYING, SEED DELINTING, LINT CLEANING, SEED STORAGE FACILITIES, SERVED BY 36 1D-3D CYCLONES

Note that the permit does not identify the type of burners used in this operation, but the applicant has verified that the unit was equipped with a 3.0 MMBtu/hr propane-fired dryer. Therefore, the emission reductions from the shut-down of the fuel-burning equipment are calculated based on LPG fuel.

The gin was limited by permit condition to a not exceed 150 tons of baled cotton/day (600 bales/day, corrected to 500 lb bales) nor 20,520 tons of baled cotton/season (82,080 bales/season, corrected to 500 lb bales). PTO C-27-1-3 was surrendered on May 15, 2017.

V. Calculations

A. Assumptions

Particulate Emissions from Ginning Operation:

- Annual criteria pollutant emissions are rounded to the nearest pound and annual GHG emissions are rounded to the nearest metric ton (District practice).
- Saw ginning rate not to exceed 150 tons of baled cotton/day (600 bales/day, corrected to 500 lb bales) nor 20,520 tons of baled cotton/season (82,080 bales/season, corrected to 500 lb bales) (permit limit).
- Based on applicant information for the operating seasons prior to the shutdown (from 2012 to 2016), shown below, the typical operating schedule is 24 hours per day, 55 days average per year in the fourth quarter (per applicant).
- PM_{2.5} fraction (% of the PM₁₀ that is also PM_{2.5}) = 1.9% (Attachment E).

Cotton Gin Operating Dates					
Season	2012	2013	2014	2015	2016
Start date	October 18, 2012	October 14, 2013	November 4, 2014	October 14, 2015	October 18, 2016
End date	December 10, 2012	November 29, 2013	December 13, 2014	December 23, 2015	December 24, 2016
4 th Quarter days	53	46	39	70	67
No of Bales	24,146	9,015	7,637	13,151	11,807

LPG Combustion from Cotton Dryers:

- The cotton gin included 3.0 MMBtu/hr in burners. All burners were fired on LPG.
- The GHG emission factor for fuel combustion includes emissions of CO₂, CH₄, and N₂O.
- Conversion: 1,000 kg = 1 metric ton.
- Conversion: 0.094 MMBtu/gal (AP-42, Appendix A, pg. 5, dated 9/85).

The applicant provided production and fuel usage records for the last five 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.

Production and Fuel Use Data		
Year	Saw Gin Production (Bales)	LPG Used (Gallons)
2012	24,146	28,000
2013	9,015	11,000
2014	7,637	5,500
2015	13,151	14,000
2016	11,807	13,000
Average	13,151	14,300

B. Emission Factors (EF)

Cotton Ginning Emissions

The PTO allowed the operation of a saw-type cotton gin and included emission limits for the ginning. The overall emission limit on the PTO for saw-type gin operation was 0.7 lb-PM₁₀/bale (see Attachment A, permit condition # 1).

District Policy APR 1110 *Use of Revised Generally Accepted Emission Factors* establishes "criteria for the use of emission factors and to address New Source Review (NSR) and Emission Reduction Credits (ERCs) issues when using revised Generally Accepted Emission Factors". Basically, the policy directs the use of emission factors (EF) that reflect "best data" when estimating emissions. For example, where facility-specific Continuous Emissions

Monitoring or source test data is available, it will be used (unless it is in violation of permit conditions or other requirements).

There are no source test results for operation of the saw-gin equipment. For equipment where there are no facility-specific source test data, the most accurate EF information is data from the California Cotton Ginners Association Handbook (CCGAH) which is based on a compilation of EFs from source tests on Valley cotton gins.

The EFs from the CCGAH and the PTO are shown in the following tables for the gin. The following tables also summarize the best emission factor for use in calculations. Note that no emission factor that is higher than the permit limit will be used for calculating emissions for the operations.

Saw Gin

Comparison of 2010 CCGAH Emission Factors and the Permitted Emissions Factors Saw Gin					
System	Cyclone Design	Source Test Result (lb-PM ₁₀ /bale)	CCGAH EFs (lb-PM ₁₀ /bale)	PTO EFs (lb-PM ₁₀ /bale)	EF Used for Calculations (lb-PM ₁₀ /bale)
Unloading	1D-3D	No Data	.11		.11
#1A and #1B moist air trash pull	1D-3D	No Data	.08		.08
#2A and #2B moist air and trash pull	1D-3D	No Data	.08		.08
#3A over head	1D-3D	No Data	.04		.04
#3B overhead	1D-3D	No Data	.04		.04
overflow	1D-3D	No Data	0.04		0.04
main trash pull	1D-3D	No Data	.08		.08
gin trash off collector	1D-3D	No Data	.08		.08
#1, #2 and #3 lint cleaner condenser	1D-3D	No Data	.09		.09
battery condenser	1D-3D	No Data	.03		.03
mote pull off of the #1 and #2	1D-3D	No Data	.07		.07
mote pull off of the #3 and #5	1D-3D	No Data	.07		.07
Ivey mote cleaner	1D-3D	No Data	.03		.03
Ivey mote cleaner trash	1D-3D	No Data	.03		.03
trash robber system	1D-3D	No Data	.06	0.07	.06
lint cleaner condenser	1D-3D	No Data	.09		.09
condenser over Ivey press	1D-3D	No Data	0.03		0.03
Total		No Data	1.05	0.70 ¹	0.70

¹The permit only lists a specific emission factor from the robber system (0.07), but also includes a total facility emission factor (0.70).

As shown above, the emissions factor for the saw gin operation is 0.70 lb-PM₁₀/bale. This is based on the use of CCGAH as the best emission factors, but then limiting the PM₁₀ emission factor by permit condition, since the facility cannot emit more PM₁₀ than allowed by permit condition.

LPG Combustion:

The cotton gin included burners that provided heated air to control the moisture content of the cotton. These burners were fired on LPG and ERCs are requested from their shutdown. The PTO does not indicate LPG combustion emission factors, so the EFs for uncontrolled LPG combustion shall be used.

Burner Emission Factors		
Operation	Emission Rate	Source
LPG combustion in the heater	0.15 lb-NO _x /MMBtu	AP-42, Table 1.5-1 (10/96)
	0.0164 lb-SO _x /MMBtu	AP-42, Table 1.5-1 (10/96), see calculation below
	O ₂	AP-42, Table 1.5-1 (10/96)
	0.021 lb-CO/MMBtu	AP-42, Table 1.5-1 (10/96)
	0.0055 lb-VOC/MMBtu	AP-42, Table 1.5-1 (10/96)

² Since combustion emissions from the dryers are discharged through the cyclones, the dryer PM₁₀ emissions are included with the ginning cyclone emission factors.

For combustion sources, GHGs include the following three "well-mixed" compounds: carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). The following greenhouse gas (GHG) EFs are from 40 CFR Part 98, Subpart C, Tables C-1 and C-2:

Greenhouse Gas Emission Factors for LPG		
GHG	EF, kg/MMBtu	EF, lb/MMBtu
CO ₂	61.71	136.04
CH ₄	0.003	0.0066
N ₂ O	0.0006	0.0013

Carbon dioxide equivalents (CO₂e) are determined by multiplying the mass emission factor by the Global Warming Potential (GWP) for the GHG pollutant. The following GWPs are from District Rule 2301 (*Emission Reduction Credit Banking*):

GHG GWP	
GHG	GWP, lb-CO₂e/lb-GHG
CO ₂	1
CH ₄	21
N ₂ O	310

An overall CO₂e emission factor is determined by combining the GHG EFs with the GWP for the respective pollutant as follows:

$$\begin{aligned}\text{CO}_2\text{e EF} &= (136.04 \text{ lb-CO}_2/\text{MMBtu} \times 1 \text{ lb-CO}_2\text{e}/\text{lb-CO}_2) + (0.0066 \text{ lb-CH}_4/\text{MMBtu} \times 21 \\ &\quad \text{lb-CO}_2\text{e}/\text{lb-CH}_4) + (0.0013 \text{ lb-N}_2\text{O}/\text{MMBtu} \times 310 \text{ lb-CO}_2\text{e}/\text{lb-N}_2\text{O}) \\ &= 136.58 \text{ lb-CO}_2\text{e}/\text{MMBtu} \\ &= 136.58 \text{ lb-CO}_2\text{e}/\text{MMBtu} \times \text{kg}/2.2046 \text{ lb} \times \text{metric ton}/1,000 \text{ kg} \\ &= 0.0620 \text{ metric tons-CO}_2\text{e}/\text{MMBtu}\end{aligned}$$

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 PTO for the cotton ginning operation was surrendered by the facility on May 15, 2017, and the application to bank the ERCs from the shutdown of the operation was received on June 2, 2017. The applicant provided Ginning Summary records on the Cotton Gins Supplemental Application Form (see Attachment C this document) that show the last production season ended in 2016 (December 24, 2016 was the end of the last production season for this site per the applicant's records).

Since cotton ginning is a seasonal operation, as shown previously in Section V.A of this document in the table "Cotton Gin Operation Dates", the periods in between operating seasons cannot be used to determine normal source operation. Therefore, the period from October 2012 through the end of 2016 will be used as the five year period of normal operation from which the baseline period will be determined.

Baseline Period Determination Data

The ginning operation was seasonal, with the actual annual throughput depending on the size of the cotton harvest. Because the harvest can vary significantly from year to year, a five-year average will be used to determine the normal source operation (NSO). Cotton throughput and LPG usage was provided by the operator and is shown below. This data matches the information provided in the annual emissions inventory surveys for this period. The appropriate cotton throughput and fuel usage values are shown in the table below.

The difference between the two-year average and NSO is calculated using the following formula:

$$\text{Difference} = [(\text{Year 1 Rate} + \text{Year 2 Rate}) \div 2] - (5 - \text{year Average Rate})$$

An example calculation of the difference (absolute value) is shown below for the 2012 and 2013 period.

$$\begin{aligned}\text{Difference} &= [(24,146 \text{ bales} + 9,015 \text{ bales}) \div 2] - 13,151 \text{ bales} \\ &= 16,581 \text{ bales} - 13,151 \text{ bales} \\ &= 3,430 \text{ bales/year}\end{aligned}$$

The calculation is repeated in the following table for cotton production and fuel usage for each two-year period in the five year period from 2012 to 2016. Note that, as previously discussed in Section V.A, production records for the past 5 years are shown for the purpose of determining the normal source operation (NSO) are shown on the following table:

Production Data				
Year	Throughput (Bales/Year)	LPG (Gallons)	Difference between two-year average and NSO (bales/year)	Difference between two-year average and NSO (gallon/year)
2012	24,146	28,000		
			3,430	6,349
2013	9,015	11,000		
			-4,825	-4,901
2014	7,637	5,500		
			-2,757	-3,401
2015	13,151	14,000		
			-672	349
2016	11,807	13,000		
5-year Averages	13,151	14,300		

For the five years immediately preceding the shutdown (2012-2016), the period matching the normal source operation (NSO) five-year average is 2015-2016. Therefore, the baseline period is 2015-2016.

- Based on the data shown in the table above, the average annual throughput during the baseline period was 12,473 bales and the average annual LPG consumption was 13,500 gallon per year.
- The PTO limited the production to 82,080 bales per year which the calculated average throughput does not exceed the permitted amount.
- LPG consumption was not limited by a permit condition, so the calculated average does not exceed the permitted amount.
- During this period, the gin was operated only in the fourth quarter.

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 – Saw Gin

$$\text{HAE}_{\text{saw ginning}} = \text{EF, lb/bale} \times 12,473 \text{ bale/year}$$

Historical Actual Emissions (HAE _{saw ginning})			
Pollutant	EF (lb-PM ₁₀ /bale)	Throughput (bales/year)	HAE lb/year
PM ₁₀	0.70	12,473	8,731

LPG Combustion HAE

$$\text{HAE}_{\text{LPG}} = \text{EF, lb/MMBtu} \times 0.094 \text{ MMBtu/gallon} \times 13,500 \text{ gallon/year}$$

Historical Actual Emissions (HAE _{LPG})				
Pollutant	EF lb/MMBtu	Throughput gal/year	Conversion MMBtu/gal	HAE lb/year
NO _x	0.15	13,500	0.094	190
SO _x	0.0164	13,500	0.094	21
PM ₁₀	0	0	0.094	0
CO	0.021	13,500	0.094	27
VOC	0.0055	13,500	0.094	7

Greenhouse Gases (GHG) HAE

$$\text{HAE}_{\text{GHG}} = \text{EF, lb/MMBtu} \times 0.094 \text{ MMBtu/gallon} \times 102,634 \text{ gallon/year}$$

Historical Actual Emissions (HAE _{GHG})				
Pollutant	EF metric tons- CO ₂ e/MMBtu	Throughput gal/year	Conversion MMBtu/gal	HAE metric tons- CO ₂ e/year
CO ₂ e	0.062	13,500	0.094	79

E. Adjustment to Historical Actual Emissions (HAE)

Emissions Adjusted for Rule 4204 - Cotton Gins

Rule 4204 (Cotton Gins) 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. 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 adjustments are needed for these systems.

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

District Rule 4309 (Dryers, Dehydrators, and Ovens), 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 requirements of this rule and no adjustment is 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 NO_x, SO_x, PM₁₀, CO, or VOC. Therefore the HAE will be equal to the values calculated in Section V.D of this evaluation.

F. Post Project Potential to Emit (PE2)

As discussed above, the subject equipment has been permanently shut down and the PTO was surrendered to the District. Therefore, the PE2 = 0 for all emissions.

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:

$$\text{AQID} = \text{AER} \times 10\%$$

AER Calculations		
Pollutant	AER lb/year	AQID lb/year
NO _x	190	19
SO _x	21	2
PM ₁₀	8,731	873
CO	27	3
VOC	7	1
Pollutant	HAE metric ton/year	AQID metric ton/year
CO ₂ e	79	0 ³

³ The AQID requirement is part of Rule 2201 and therefore only applies to criteria pollutants that are governed by that rule. Calculations for GHG emission reductions are detailed in Rule 2301, Section 4.5, which does not include a provision for an AQID.

H. Emission Reductions Eligible for Banking

The emission reductions eligible for banking are the difference between the historical actual emissions and the potential to emit after the project. Since the post-project emissions = 0 for all pollutants, the emission reductions eligible for banking equals the HAE, minus the AQID.

The amount of Bankable AER was calculated according to the following formula and results are showing in the table below:

$$\text{Bankable AER} = \text{AER} - \text{AQID}$$

Bankable AER			
Pollutant	AER lb/year	AQID lb/year	Bankable AER lb/year
NO _x	190	19	171
SO _x	21	2	19
PM ₁₀	8,731	873	7,858
CO	27	3	24
VOC	7	1	6
Pollutant	AER metric tons /year	AQID metric tons/year	Bankable AER metric tons/year
CO _{2e}	79	0	79

During the baseline period, the gin was operated solely in the fourth quarter. Therefore, the bankable ERCs will be distributed to the fourth quarter only.

VI. Compliance

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 PTO for the cotton ginning equipment was surrendered, effective October 27, 2016. As these emission reductions occurred after September 19, 1991, the criteria in Section 4.2 must be satisfied.

Section 4.2.1 requires that the emission reductions are real, surplus, permanent, quantifiable, and enforceable. The following is a discussion of compliance with Section 4.2.1 requirements for criteria pollutant emissions.

Criteria Pollutant Emissions

Emission Reductions are Real

The emission reductions were generated by the shutdown of a 3.0 MMBtu/hr cotton gin. The real emissions were calculated from actual historic production throughput and fuel-use data and recognized emission factors. The ginning equipment has been removed from service and the permit was subsequently surrendered to the District. Therefore, the emission reductions satisfy the real requirement.

Emission Reductions are Surplus

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

- 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 PM₁₀ Maintenance Plan, 2008, 2012, 2015, and 2016 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 LPG consumption, so no adjustments are necessary on that basis.
- There are no laws, rules, regulations, agreements, orders, or permits requiring any GHG emission reductions from cotton ginning operations.
- The emission reductions are not the result of an action taken by the permittee to comply with any requirement of Rule 4204 Cotton Gins.

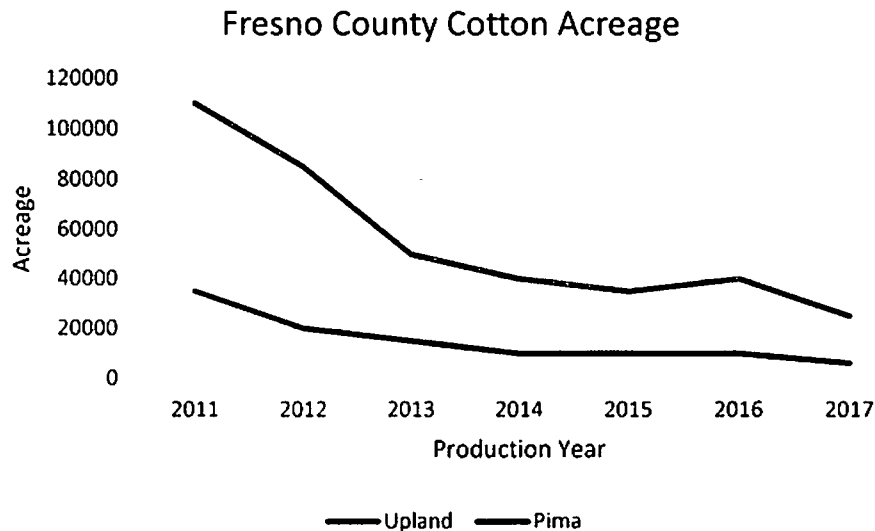
Therefore, the emission reductions satisfy the surplus requirement.

Emission Reductions are Permanent

The gin has been shut down, and the PTO has been surrendered. 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, Fresno County cotton acreage dropped significantly in the last 5 years. According to the applicant, this decline in cotton production led the closure of this facility. Because of the decline in cotton production in the state, it is expected that there will be no shifting of the past emissions to a similar facility.

Therefore, the emission reductions satisfy the surplus requirement.



Fresno County Annual Crop Report (2017 acreage estimated from trend line)

Emission Reductions are Quantifiable

Actual Emission Reductions (AER) amounts were calculated from historic process throughput data, source test results from similar operations, California Cotton Ginners Association emission factors, and methods according to District Rule 2201. Therefore, the reductions are quantifiable. Therefore, the emission reductions satisfy the quantifiable requirement.

Emission Reductions are Enforceable

The PTO for this facility has been surrendered and the gins 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.

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 June 2, 2017, and the PTO was surrendered on May 15, 2017. According to District Policy APR 1805, the date of the shutdown is considered to be the date on which the PTO is 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 was filed 17 days after the gin closure and is therefore 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 so 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 4.5 details criteria for determining eligibility of Green House Gas (GHG) emissions for banking. The applicant has requested to bank the GHG AER so this section is applicable.

Section 4.5.1 requires that the GHG emission reductions must have occurred after January 1, 2005. As stated above, the gin was shutdown effective May 15, 2017, so the GHG emission reductions satisfy the requirements of this section.

Section 4.5.2 requires that the reductions must have occurred within the San Joaquin Valley Air Pollution Control District. The emissions occurred at 5854 S San Diego, Mendota, CA. This location is in Fresno County located within the San Joaquin Valley Air Pollution Control District boundaries. Therefore, the GHG emission reductions satisfy the location requirement of this section.

Section 4.5.3 requires that the GHG emission reductions must be real, surplus, permanent, quantifiable, and enforceable. The following is a discussion of compliance with Section 4.5.3 requirements for greenhouse gas emissions

GHG Emissions:

Emission Reductions are Real

The GHG emission reductions were generated by the shutdown of one 3.0 MMBtu/hr cotton gin. The GHG emissions were calculated from actual historic production throughput and fuel-use data and recognized GHG emission factors. The ginning equipment has been removed from service and the permit was subsequently surrendered to the District. Therefore, the GHG emission reductions satisfy the real requirement.

Emission Reductions are Surplus

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

- The shutdown of the gin was voluntary and not required by any law, rule, agreement, or regulation.
- These GHG ERCs are not needed for their current or proposed operations.
- The GHG emission factors are not subject to additional adjustments and are therefore surplus to the requirements of the District's 2007 PM₁₀ Maintenance Plan, 2008, 2012, 2015, and 2016 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 LPG consumption, so no adjustments are necessary on that basis.
- The facility is not in one of the categories subject to CARB GHG cap and trade regulations and there are no other laws, rules, regulations, agreements, orders, or permits requiring any GHG emission reductions from cotton ginning operations.
- The GHG 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 GHG emission reductions satisfy the surplus requirement.

Emission Reductions are Permanent

The gin has been shut down, and the PTO has been surrendered. Further operation requires an application to the District.

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 was shown in the earlier section, cotton acreage in Fresno County dropped significantly in the last 5 years. According to the applicant, this decline in cotton production led the closure of this facility. Because of the decline in production, it is expected that there will be no shifting of the past GHG emissions to a similar facility. Therefore, the GHG emission reductions satisfy the permanent requirement.

Emission Reductions are Quantifiable

Actual Emission Reductions (AER) amounts were calculated from historic process throughput data, EPA and District emission factors, and methods according to District Rules. Therefore, the GHG emission reductions satisfy the quantifiable requirement.

Emission Reductions are Enforceable

The PTO for this facility has been surrendered and the gins 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 GHG emission reductions satisfy the enforceable requirement.

Section 4.5.4 requires that GHG emission reductions be calculated as the difference between the historic annual average GHG emissions (as CO₂e) and the PE₂ after the reduction is complete. The historical GHG emissions must be calculated using the consecutive 24 month period immediately prior to the date the emission reductions occurred, or another consecutive 24 month period in the 60 months prior to the date the emission reduction occurred if determined by the APCO as being more representative of normal operations.

The GHG emission reductions were calculated according to the baseline period identified above. Since this is a permanent shutdown of the cotton ginning operation and its associated equipment, with none of the load being shifted to any other cotton gin within the boundaries

of the San Joaquin Valley Air Pollution Control District jurisdiction, there is no post-project potential to emit GHG.

Section 4.5.5 requires that GHG emission reductions be quantified using CARB-approved emission reduction project protocols. Since the GHG emission reductions are not subject to an applicable CARB-approved emission reduction project protocol, this section is not applicable.

Section 4.5.6 requires that ERCs shall be made enforceable through permit conditions or legally binding contract. The cotton gin operators held a legal District operating permit. That permit has been surrendered to the District. Since the operation of the equipment would require new ATCs, as discussed above, the GHG emission reduction is enforceable.

Section 5.0 - ERC Application Procedures

Section 5.5 of Rule 2301 states that ERC certificate applications for reductions shall be submitted within 180 days after the emission reduction occurs. The ERC banking application was filed on June 3, 2017, 17 days after the PTO was surrendered and the operations at this location were permanently ceased effective May 15, 2017. 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:

Section 6.14 GHG emission reductions shall be banked as metric tons of CO₂e per year, rounded to the nearest metric ton.

The draft GHG ERC is identified as metric tons of CO₂e per year, rounded to the nearest metric ton.

Section 6.15 specifies the registration requirements for GHG ERCs.

This emission reduction is surplus and additional of all requirements pursuant to Section 4.5.3.4. Therefore the ERC certificate shall include the following notation:

"This emission reduction is surplus and additional to all applicable regulatory requirements."

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

VII. Recommendation

Pending a successful Public Noticing period, issue Emission Reduction Credit (ERC) certificate to Alta Vista Gin. in accordance with the amounts specified on the draft ERC certificates in Attachment F.

Attachments:

- Attachment A: Surrendered PTO C-27-1-3
- Attachment B: ERC Application
- Attachment C: Cotton Ginning Throughput and LPG Usage Records
- Attachment D: GHG Emission Factors (40 CFR Part 98, Tables A-1, C-1 and C-2) and Global Warming Potentials (GWP) (Rule 2301, Table 1)
- Attachment E: PM_{2.5} Fraction
- Attachment F: Draft ERC Certificates

Attachment A

Surrendered PTO C-27-1-3

INSPECTION
EXPIRATION DATE: 12/31/2020
WORKSHEET

LEGAL OWNER OR OPERATOR: ALTA VISTA GIN/MURRIETA FARM

MAILING ADDRESS: 5854 S SAN DIEGO
MENDOTA, CA 93640

LOCATION: 5854 S SAN DIEGO
MENDOTA, CA 93640

INSPECT PROGRAM PARTICIPANT: NO

EQUIPMENT DESCRIPTION:

COTTON GIN WITH TRUCK UNLOADING, COTTON DRYING, SEED DELINTING, LINT CLEANING, SEED STORAGE FACILITIES, SERVED BY 36 1D-3D CYCLONES

CONDITIONS

1. Total facility emissions shall not exceed 2.8 lbs PM-10/ton of baled cotton (0.7 lb PM-10/bale, corrected to 500 lb bales). [District Rule 2201]
2. Ginning rate shall not exceed 150 tons of baled cotton/day (600 bales/day, corrected to 500 lb bales) nor 20,520 tons of baled cotton/season (82,080 bales/season, corrected to 500 lb bales). [District Rule 2201]
3. Emissions from the robber system shall not exceed 0.07 lb PM-10/bale. [District Rule 2201]
4. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
5. The trash auger of the trash piling system shall have both sides equipped with wind barriers that extend, as measured vertically prior to trash pile build-up, one foot above and three feet below the auger. [District Rule 4204]
6. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
7. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
8. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
9. After the trash pile has built up to the height of the trash auger, removing material from the pile shall be performed in such a way as to prevent free-falling trash from the stockpiling system. [District Rule 4204]
10. If the trash stockpile is removed to prevent the build-up of heat in the pile, the operator shall record the date of the removal. [District Rule 4204]
11. {12} Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
12. Operating schedule shall not exceed 180 days per year. [District NSR Rule]
13. The module and trailer unloading shall be controlled by three 38" 1D-3D cyclones. [District Rule 2201]
14. The #1A and #1B moist air trash pull shall be controlled by four 42" 1D-3D cyclones. [District Rule 2201]
15. The #2A and #2B moist air and trash pull shall be controlled by four 42" 1D-3D cyclones. [District Rule 2201]
16. The #3A over head moist air pull shall be controlled by two 38" 1D-3D cyclones. [District Rule 2201]
17. The #3B overhead moist air pull shall be controlled by two 38" 1D-3D cyclones. [District Rule 2201]
18. The overflow separator shall be controlled by one 38" 1D-3D cyclones. [District Rule 2201]
19. The main trash pull fan shall be controlled by one 36" 1D-3D cyclones. [District Rule 2201]
20. The gin trash off collector shall be controlled by two 36" 1D-3D cyclones. [District Rule 2201]
21. The #1, #2 and #3 lint cleaner condenser pull system shall each be controlled by two 56" 1D-3D cyclones. [District Rule 2201]

CONDITIONS FOR PERMIT C-27-1-3

Page 2 of 2

22. The battery condenser pull shall be controlled by two 70" 1D-3D cyclones. [District Rule 2201]
23. The mote pull off of the #1 and #2 lint cleaners shall be controlled by one 42" 1D-3D cyclones. [District Rule 2201]
24. The mote pull off of the #3 and #5 lint cleaners shall be controlled by two 42" 1D-3D cyclones. [District Rule 2201]
25. The Ivey mote cleaner shall be controlled by one 34" 1D-3D cyclones. [District Rule 2201]
26. The Ivey mote cleaner trash pull shall be controlled by one 34" 1D-3D cyclones. [District Rule 2201]
27. The lint cleaner and battery condenser trash robber system shall be controlled by two 42" 1D-3D cyclones. [District Rule 2201]
28. The lint cleaner condenser shall be controlled by one 52" 1D-3D cyclones. [District Rule 2201]
29. The condenser over Ivey press shall be controlled by one 52" 1D-3D cyclones. [District Rule 2201]
30. Permittee shall conduct daily visual inspections of the material handling systems for leaks, breaks, or other visible signs of equipment malfunctions. [District Rule 4204]
31. 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]
32. Permittee shall record daily processing rate and operating schedule. [District Rules 2201]
33. All records shall be retained on site for five years and made available to the District upon request. [District Rules 1070 and 4204]

Attachment B

ERC Application

RECEIVED

San Joaquin Valley Air Pollution Control District

JUN 02 2017

Application for

☒ EMISSION REDUCTION CREDIT (ERC)

☐ CONSOLIDATION OF ERC CERTIFICATES

Permits Services
SJVAPCD

1. ERC TO BE ISSUED TO: <u>Turner Island Farms</u>		Facility ID: <u>C-27</u> (if known)				
2. MAILING ADDRESS: Street/P.O. Box: <u>10935 So. Turner Island</u>						
City: <u>Dos Palos</u>		State: <u>Ca</u> Zip Code: <u>93620</u>				
3. LOCATION OF REDUCTION: Street: <u>5854 S San Diego</u> City: <u>Mendota Ca 93640</u> <u>Susw</u> 1/4 SECTION <u>3</u> TOWNSHIP <u>15S</u> RANGE <u>14E</u>		4. DATE OF REDUCTION: <u>5-15-17</u>				
5. PERMIT NO(S): <u>C-27</u>		EXISTING ERC NO(S):				
6. METHOD RESULTING IN EMISSION REDUCTION: ☒ SHUTDOWN ☐ RETROFIT ☐ PROCESS CHANGE ☐ OTHER DESCRIPTION: _____ (Use additional sheets if necessary)						
7. REQUESTED ERCs: (In pounds per calendar quarter except CO ₂ e)						
	VOC	NOx	CO	PM ₁₀	SOx	Other
1 st Qtr						
2 nd Qtr						
3 rd Qtr						
4 th Qtr	<u>7</u>	<u>196</u>	<u>27</u>	<u>9206</u>	<u>21</u>	
CO ₂ e <u>82.38</u>		metric ton/yr				
8. SIGNATURE OF APPLICANT: 		TYPE OR PRINT TITLE OF APPLICANT: <u>C.O.O.</u>				
9. TYPE OR PRINT NAME OF APPLICANT: <u>Scott Skinner</u>		DATE: <u>5-30-17</u>	PHONE #: <u>209-827-7700</u> CELL PHONE #: FAX #: <u>209-827-7780</u> E-MAIL:			

FOR APCD USE ONLY:

DATE STAMP	FILING FEE RECEIVED: \$ <u>832.00</u> <u>CHECK # 2093</u> DATE PAID: <u>June 2, 2017</u> PROJECT NO.: <u>C-1171943</u> FACILITY ID.: <u>C-27</u>
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Attachment C

Cotton Ginning Throughput and LPG Usage Records

Facility Emissions Summary

Inventory Year: 2016 County: 10 Facility ID: 27

Facility Name: ALTA VISTA GIN/MURRIETA FARM

Device: 1 Device Name: Cotton Gin

Process: 1 Process Description: Cotton Gin - 500 LB Bales Cotton

Process Rate: 11807. Units: BALES OF COTTON

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	7.00E-01	4.13E+00	5.73E-03	District Permit (0.7 lb/bale)	
7440382	Arsenic	3.99E-06	4.71E-02	6.53E-05	Fugitive Toxics: Cotton Gin - PM Speciation	0.5
7440439	Cadmium	7.00E-07	8.26E-03	1.15E-05	Fugitive Toxics: Cotton Gin - PM Speciation	6.205
18540299	Chromium, hexavalent (& co	2.37E-07	2.80E-03	3.88E-06	Fugitive Toxics: Cotton Gin - PM Speciation	0.05
7440508	Copper	1.47E-05	1.74E-01	2.40E-04	Fugitive Toxics: Cotton Gin - PM Speciation	50
7439921	Lead	1.12E-05	1.32E-01	1.83E-04	Fugitive Toxics: Cotton Gin - PM Speciation	5
7439965	Manganese	7.00E-05	8.26E-01	1.15E-03	Fugitive Toxics: Cotton Gin - PM Speciation	50
7440020	Nickel	4.90E-06	5.79E-02	8.02E-05	Fugitive Toxics: Cotton Gin - PM Speciation	0.5
7782492	Selenium	7.00E-06	8.26E-02	1.15E-04	Fugitive Toxics: Cotton Gin - PM Speciation	50
7440666	Zinc	3.29E-05	3.88E-01	5.38E-04	Fugitive Toxics: Cotton Gin - PM Speciation	50

Process: 2 Process Description: LPG Combustion - Cotton Gin - Dryers/Burners

Process Rate: 13. Units: 1000 GALLONS BURNED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
42101	Carbon Monoxide	1.88E+00	1.22E-02	1.60E-05	District Cotton Gin Emission Factors	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Wednesday, August 2, 2017

Page 1 of 2

42603	Oxides of Nitrogen	9.40E+00	6.11E-02	7.99E-05	District Cotton Gin Emission Factors	
16113	Reactive Organic Gas	4.70E-01	3.05E-03	3.99E-06	District Cotton Gin Emission Factors	
42401	Sulfur Dioxide	7.52E-01	4.89E-03	6.39E-06	District Cotton Gin Emission Factors	
75070	Acetaldehyde	4.30E-03	5.59E-02	7.31E-05	Toxics: Cotton Gin - Combustion	50
107028	Acrolein	2.70E-03	3.51E-02	4.59E-05	Toxics: Cotton Gin - Combustion	5
71432	Benzene	8.00E-03	1.04E-01	1.36E-04	Toxics: Cotton Gin - Combustion	5
100414	Ethyl benzene	9.50E-03	1.23E-01	1.61E-04	Toxics: Cotton Gin - Combustion	50
50000	Formaldehyde	1.70E-02	2.21E-01	2.89E-04	Toxics: Cotton Gin - Combustion	50
110543	Hexane	6.30E-03	8.19E-02	1.07E-04	Toxics: Cotton Gin - Combustion	50
91203	Naphthalene	3.00E-04	3.90E-03	5.10E-06	Toxics: Cotton Gin - Combustion	50
1151	PAHs, total, w/o individ. com	1.00E-04	1.30E-03	1.70E-06	Toxics: Cotton Gin - Combustion	50
115071	Propylene	7.31E-01	9.50E+00	1.24E-02	Toxics: Cotton Gin - Combustion	50
108883	Toluene	3.66E-02	4.76E-01	6.22E-04	Toxics: Cotton Gin - Combustion	50
1330207	Xylenes (mixed)	2.72E-02	3.54E-01	4.62E-04	Toxics: Cotton Gin - Combustion	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Facility Totals

CAS	Pollutant Name	Emissions			
42101	Carbon Monoxide	1.22E-02	TONS-YR	1.60E-05	TONS-HR
42603	Oxides of Nitrogen	6.11E-02	TONS-YR	7.99E-05	TONS-HR
85101	Particulate Matter 10	4.13E+00	TONS-YR	5.73E-03	TONS-HR
16113	Reactive Organic Gas	3.05E-03	TONS-YR	3.99E-06	TONS-HR
42401	Sulfur Dioxide	4.89E-03	TONS-YR	6.39E-06	TONS-HR
75070	Acetaldehyde	5.59E-02	LB-YR	7.31E-05	LB-HR
107028	Acrolein	3.51E-02	LB-YR	4.59E-05	LB-HR
7440382	Arsenic	4.71E-02	LB-YR	6.53E-05	LB-HR
71432	Benzene	1.04E-01	LB-YR	1.36E-04	LB-HR
7440439	Cadmium	8.26E-03	LB-YR	1.15E-05	LB-HR
18540299	Chromium, hexavalent (& compounds)	2.80E-03	LB-YR	3.88E-06	LB-HR
7440508	Copper	1.74E-01	LB-YR	2.40E-04	LB-HR
100414	Ethyl benzene	1.23E-01	LB-YR	1.61E-04	LB-HR
50000	Formaldehyde	2.21E-01	LB-YR	2.89E-04	LB-HR
110543	Hexane	8.19E-02	LB-YR	1.07E-04	LB-HR
7439921	Lead	1.32E-01	LB-YR	1.83E-04	LB-HR
7439965	Manganese	8.26E-01	LB-YR	1.15E-03	LB-HR
91203	Naphthalene	3.90E-03	LB-YR	5.10E-06	LB-HR
7440020	Nickel	5.79E-02	LB-YR	8.02E-05	LB-HR
1151	PAHs, total, w/o individ. components reported	1.30E-03	LB-YR	1.70E-06	LB-HR
115071	Propylene	9.50E+00	LB-YR	1.24E-02	LB-HR
7782492	Selenium	8.26E-02	LB-YR	1.15E-04	LB-HR
108883	Toluene	4.76E-01	LB-YR	6.22E-04	LB-HR
1330207	Xylenes (mixed)	3.54E-01	LB-YR	4.62E-04	LB-HR
7440666	Zinc	3.88E-01	LB-YR	5.38E-04	LB-HR

MT = Metric Ton = 2,204.6 pounds

Facility Totals

CAS	Pollutant Name	Emissions			
42101	Carbon Monoxide	1.32E-02	TONS-YR	1.60E-05	TONS-HR
42603	Oxides of Nitrogen	6.58E-02	TONS-YR	7.99E-05	TONS-HR
85101	Particulate Matter 10	4.60E+00	TONS-YR	5.73E-03	TONS-HR
16113	Reactive Organic Gas	3.29E-03	TONS-YR	3.99E-06	TONS-HR
42401	Sulfur Dioxide	5.26E-03	TONS-YR	6.39E-06	TONS-HR
75070	Acetaldehyde	6.02E-02	LB-YR	7.31E-05	LB-HR
107028	Acrolein	3.78E-02	LB-YR	4.59E-05	LB-HR
7440382	Arsenic	5.25E-02	LB-YR	6.53E-05	LB-HR
71432	Benzene	1.12E-01	LB-YR	1.36E-04	LB-HR
7440439	Cadmium	9.21E-03	LB-YR	1.15E-05	LB-HR
18540299	Chromium, hexavalent (& compounds)	3.12E-03	LB-YR	3.88E-06	LB-HR
7440508	Copper	1.93E-01	LB-YR	2.40E-04	LB-HR
100414	Ethyl benzene	1.33E-01	LB-YR	1.61E-04	LB-HR
50000	Formaldehyde	2.38E-01	LB-YR	2.89E-04	LB-HR
110543	Hexane	8.82E-02	LB-YR	1.07E-04	LB-HR
7439921	Lead	1.47E-01	LB-YR	1.83E-04	LB-HR
7439965	Manganese	9.21E-01	LB-YR	1.15E-03	LB-HR
91203	Naphthalene	4.20E-03	LB-YR	5.10E-06	LB-HR
7440020	Nickel	6.44E-02	LB-YR	8.02E-05	LB-HR
1151	PAHs, total, w/o individ. components reported	1.40E-03	LB-YR	1.70E-06	LB-HR
115071	Propylene	1.02E+01	LB-YR	1.24E-02	LB-HR
7782492	Selenium	9.21E-02	LB-YR	1.15E-04	LB-HR
108883	Toluene	5.12E-01	LB-YR	6.22E-04	LB-HR
1330207	Xylenes (mixed)	3.81E-01	LB-YR	4.62E-04	LB-HR
7440666	Zinc	4.33E-01	LB-YR	5.38E-04	LB-HR

MT = Metric Ton = 2,204.6 pounds

Facility Emissions Summary

Inventory Year: 2015 County: 10 Facility ID: 27

Facility Name: ALTA VISTA GIN/MURRIETA FARM

Device: 1 Device Name: Cotton Gin

Process: 1 Process Description: Cotton Gin - 500 LB Bales Cotton

Process Rate: 13151. Units: BALES OF COTTON

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	7.00E-01	4.60E+00	5.73E-03	District Permit (0.7 lb/bale)	
7440382	Arsenic	3.99E-06	5.25E-02	6.53E-05	Fugitive Toxics: Cotton Gin - PM Speciation	0.5
7440439	Cadmium	7.00E-07	9.21E-03	1.15E-05	Fugitive Toxics: Cotton Gin - PM Speciation	6.205
18540299	Chromium, hexavalent (& co	2.37E-07	3.12E-03	3.88E-06	Fugitive Toxics: Cotton Gin - PM Speciation	0.05
7440508	Copper	1.47E-05	1.93E-01	2.40E-04	Fugitive Toxics: Cotton Gin - PM Speciation	50
7439921	Lead	1.12E-05	1.47E-01	1.83E-04	Fugitive Toxics: Cotton Gin - PM Speciation	5
7439985	Manganese	7.00E-05	9.21E-01	1.15E-03	Fugitive Toxics: Cotton Gin - PM Speciation	50
7440020	Nickel	4.90E-06	6.44E-02	8.02E-05	Fugitive Toxics: Cotton Gin - PM Speciation	0.5
7782492	Selenium	7.00E-06	9.21E-02	1.15E-04	Fugitive Toxics: Cotton Gin - PM Speciation	50
7440666	Zinc	3.29E-05	4.33E-01	5.38E-04	Fugitive Toxics: Cotton Gin - PM Speciation	50

Process: 2 Process Description: LPG Combustion - Cotton Gin - Dryers/Burners

Process Rate: 14. Units: 1000 GALLONS BURNED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
42101	Carbon Monoxide	1.88E+00	1.32E-02	1.60E-05	District Cotton Gin Emission Factors	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Thursday, June 16, 2016

Page 1 of 2

42603	Oxides of Nitrogen	9.40E+00	6.58E-02	7.99E-05	District Cotton Gin Emission Factors	
16113	Reactive Organic Gas	4.70E-01	3.29E-03	3.99E-06	District Cotton Gin Emission Factors	
42401	Sulfur Dioxide	7.52E-01	5.26E-03	6.39E-06	District Cotton Gin Emission Factors	
75070	Acetaldehyde	4.30E-03	6.02E-02	7.31E-05	Toxics: Cotton Gin - Combustion	50
107028	Acrolein	2.70E-03	3.78E-02	4.59E-05	Toxics: Cotton Gin - Combustion	5
71432	Benzene	8.00E-03	1.12E-01	1.36E-04	Toxics: Cotton Gin - Combustion	5
100414	Ethyl benzene	9.50E-03	1.33E-01	1.61E-04	Toxics: Cotton Gin - Combustion	50
50000	Formaldehyde	1.70E-02	2.38E-01	2.89E-04	Toxics: Cotton Gin - Combustion	50
110543	Hexane	6.30E-03	8.82E-02	1.07E-04	Toxics: Cotton Gin - Combustion	50
91203	Naphthalene	3.00E-04	4.20E-03	5.10E-06	Toxics: Cotton Gin - Combustion	50
1151	PAHs, total, w/o individ. com	1.00E-04	1.40E-03	1.70E-06	Toxics: Cotton Gin - Combustion	50
115071	Propylene	7.31E-01	1.02E+01	1.24E-02	Toxics: Cotton Gin - Combustion	50
108883	Toluene	3.66E-02	5.12E-01	6.22E-04	Toxics: Cotton Gin - Combustion	50
1330207	Xylenes (mixed)	2.72E-02	3.81E-01	4.62E-04	Toxics: Cotton Gin - Combustion	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

C-1161766

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JUN 03 2016

/ Electronic

2 - SJVUAPCD

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

1990 E. Gettysburg Ave., Fresno, CA 93726

(559) 230 - 6000 FAX: (559) 230 - 6081

District BCode

SURVEY FOR THE ANNUAL EMISSION INVENTORY : 2015

FACILITY ID#: C-27

TAD #: 10-27

SIC #: 724

PHONE #: (0) 0-



ALTA VISTA GIN/MURRIETA FARM

5854 S SAN DIEGO

MENDOTA, CA 93640

SITE ADDRESS : 5854 S SAN DIEGO, MENDOTA

Is this information considered:

☐ CONFIDENTIAL
☐ NOT CONFIDENTIAL

Note: All requests for confidentiality must be supported by a written justification (Title 17, section 91010, California Administrative Code)

WorkSheet for Permit #: C-27-1-3

COTTON GIN WITH TRUCK UNLOADING, COTTON DRYING, SEED DELINTING, LINT CLEANING, SEED STORAGE FACILITIES,
SERVED BY 36 10-3D CYCLONES

COTTON GINS

Annual Process Data:

Number of STD. 500 Lb Bales for Last Season: 13151

Fuel Combustion Data:

Primary Fuel (circle one) NG, Diesel, (LPG) Other: _____Annual Fuel Usage: 14000

Units (circle one) SCF, BTU, Therms, Gals, Other: _____

(If applicable) Secondary Fuel (circle one) NG, Diesel, LPG, Other: _____

Annual Fuel Usage: _____

Units (circle one) SCF, BTU, Therms, Gals, Other: _____

Length of Operating Season In Days: 67

Duration in months (e.g. from October Through January)

From Oct Through Dec

Comments: _____

Facility Wide Relative Monthly Activity

If the facility has same operating schedule year round, then please check the Default Monthly Activity box. Otherwise, provide the percentage and months the facility operates. The total percentage for the year must add up to 100%. (100% / 12 = 8.3)

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
DEFAULT MONTHLY ACTIVITY	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3
RELATIVE MONTHLY ACTIVITY										24	42	34

Facility Daily Schedule

Please indicate with circles the normal operating schedule:

Hours per day: 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24

Days per week: Sunday Monday Tuesday Wednesday Thursday Friday Saturday

Responsible Official Information

Facility	ALTA VISTA GIN/MURRIETA FARM
Facility ID	C-27
Questionnaire Answered By, Title	Lloyd Hendrickson
Telephone Number	(0) 0-
Responsible Official	Lloyd Hendrickson
Responsible Official Telephone Number	(0) 655-3370
Responsible Official Signature	
Date	

Emission Inventory - Calendar Year 2014 Survey

Facility ID: C-27
TAD: 10-27
SIC: 724
Facility Name: ALTA VISTA GIN/MURRIETA FARM
Toxic ID: 40159
Confidential Process Rates: N

Permit Number	Process Number	Process Type	Process Rate	Process Units	Process Material	Dist to Business (ft.)	Dist. to Residence (ft.)	Dist. to School (ft.)
1	1	Cotton gin - fuel use	5500.00		Propane/LPG	14728.00	250.00	
1	2	Cotton gin - cotton processed	7637.00	Bales	Cotton	14728.00	250.00	
1	3	N/A	0.00	N/A	N/A	14728.00	250.00	

Contact Lloyd Hendrickson
Company ALTA VISTA GIN/MURRIETA FARM
Address 5854 S SAN DIEGO
City, State, Zip: MENDOTA , CA 93640
Telephone (0) -000-0000
E-mail altavista@wolfseninc.com
Location of facility if different from above 5854 S SAN DIEGO
 MENDOTA, CA 93640

Name and Title of Responsible Official

Name: _____

Title: _____



By checking this box, I certify that the information contained in the Emissions Survey is accurate to the best of my knowledge.

CONFIDENTIAL:

Facility Emissions Summary

Inventory Year: 2014 County: 10 Facility ID: 27

Facility Name: ALTA VISTA GIN/MURRIETA FARM

Device: 1 Device Name: Cotton Gin

Process: 1 Process Description: Cotton Gin - 500 LB Bales Cotton

Process Rate: 7637. Units: BALES OF COTTON

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	7.00E-01	2.67E+00	1.52E-01	District Permit (0.7 lb/bale)	
7440382	Arsenic	3.99E-06	3.05E-02	1.74E-03	Fugitive Toxics: Cotton Gin - PM Speciation	0.5
7440439	Cadmium	7.00E-07	5.35E-03	3.04E-04	Fugitive Toxics: Cotton Gin - PM Speciation	6.205
18540299	Chromium, hexavalent (& co	2.37E-07	1.81E-03	1.03E-04	Fugitive Toxics: Cotton Gin - PM Speciation	0.05
7440508	Copper	1.47E-05	1.12E-01	6.39E-03	Fugitive Toxics: Cotton Gin - PM Speciation	50
7439921	Lead	1.12E-05	8.55E-02	4.87E-03	Fugitive Toxics: Cotton Gin - PM Speciation	5
7439965	Manganese	7.00E-05	5.35E-01	3.04E-02	Fugitive Toxics: Cotton Gin - PM Speciation	50
7440020	Nickel	4.90E-06	3.74E-02	2.13E-03	Fugitive Toxics: Cotton Gin - PM Speciation	0.5
7782492	Selenium	7.00E-06	5.35E-02	3.04E-03	Fugitive Toxics: Cotton Gin - PM Speciation	50
7440666	Zinc	3.29E-05	2.51E-01	1.43E-02	Fugitive Toxics: Cotton Gin - PM Speciation	50

Process: 2 Process Description: LPG Combustion - Cotton Gin - Dryers/Burners

Process Rate: 5.5 Units: 1000 GALLONS BURNED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
42101	Carbon Monoxide	1.88E+00	5.17E-03	9.30E-05	District Cotton Gin Emission Factors	
42603	Oxides of Nitrogen	9.40E+00	2.59E-02	4.65E-04	District Cotton Gin Emission Factors	
16113	Reactive Organic Gas	4.70E-01	1.29E-03	2.32E-05	District Cotton Gin Emission Factors	
42401	Sulfur Dioxide	7.52E-01	2.07E-03	3.72E-05	District Cotton Gin Emission Factors	
75070	Acetaldehyde	4.30E-03	2.37E-02	4.25E-04	Toxics: Cotton Gin - Combustion	50

107028	Acrolein	2.70E-03	1.49E-02	2.67E-04	Toxics: Cotton Gin - Combustion	5
71432	Benzene	8.00E-03	4.40E-02	7.91E-04	Toxics: Cotton Gin - Combustion	5
100414	Ethyl benzene	9.50E-03	5.22E-02	9.40E-04	Toxics: Cotton Gin - Combustion	50
50000	Formaldehyde	1.70E-02	9.35E-02	1.68E-03	Toxics: Cotton Gin - Combustion	50
110543	Hexane	6.30E-03	3.47E-02	6.23E-04	Toxics: Cotton Gin - Combustion	50
91203	Naphthalene	3.00E-04	1.65E-03	2.97E-05	Toxics: Cotton Gin - Combustion	50
1151	PAHs, total, w/o individ. com	1.00E-04	5.50E-04	9.89E-06	Toxics: Cotton Gin - Combustion	50
115071	Propylene	7.31E-01	4.02E+00	7.23E-02	Toxics: Cotton Gin - Combustion	50
108883	Toluene	3.66E-02	2.01E-01	3.62E-03	Toxics: Cotton Gin - Combustion	50
1330207	Xylenes (mixed)	2.72E-02	1.50E-01	2.69E-03	Toxics: Cotton Gin - Combustion	50

Emission Inventory - Calendar Year 2013 Survey

Facility ID: C-27
 TAD: 10-27
 SIC: 724
 Facility Name: ALTA VISTA GIN/MURRIETA FARM
 Toxic ID: 40159
 Confidential Process Rates: N

Permit Number	Process Number	Process Type	Process Rate	Process Units	Process Material	Dist to Business (ft.)	Dist. to Residence (ft.)	Dist. to School (ft.)
1	1	Cotton gin - fuel use	11000.00	Gallons	Propane/LPG	14784.00	250.00	
1	2	Cotton gin - cotton processed	9015.00	Bales	Cotton	14784.00	250.00	
1	3	N/A	0.00	N/A	N/A	14784.00	250.00	

Contact Lloyd Hendrickson
Company ALTA VISTA GIN/MURRIETA FARM
Address 5854 S SAN DIEGO
City, State, Zip: MENDOTA, CA 93640
Telephone (559) -6553222
E-mail al
Location of facility if different from above 5854 S SAN DIEGO
 MENDOTA, CA 93640

Name and Title of Responsible Official

Name: _____
 Title: _____



By checking this box, I certify that the information contained in the Emissions Survey is accurate to the best of my knowledge.

CONFIDENTIAL:

Facility Emissions Summary

Inventory Year: 2013 County: 10 Facility ID: 27
Facility Name: ALTA VISTA GIN/MURRIETA FARM

Device: 1 Device Name: Cotton Gin

Process: 1 Process Description: Cotton Gin - 500 Lb Bales Cotton

Process Rate: 9015. Units: BALES OF COTTON

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	7.00E-01	3.16E+00	1.52E-01	District (PTO)	
7440382	Arsenic	3.99E-06	3.60E-02	1.74E-03	Fugitive Toxics: Cotton Gin - PM Speciation	0.5
7440439	Cadmium	7.00E-07	6.31E-03	3.04E-04	Fugitive Toxics: Cotton Gin - PM Speciation	6.205
18540299	Chromium, hexavalent (& co	2.37E-07	2.14E-03	1.03E-04	Fugitive Toxics: Cotton Gin - PM Speciation	0.05
7440508	Copper	1.47E-05	1.33E-01	6.39E-03	Fugitive Toxics: Cotton Gin - PM Speciation	50
7439921	Lead	1.12E-05	1.01E-01	4.87E-03	Fugitive Toxics: Cotton Gin - PM Speciation	5
7439965	Manganese	7.00E-05	6.31E-01	3.04E-02	Fugitive Toxics: Cotton Gin - PM Speciation	50
7440020	Nickel	4.90E-06	4.42E-02	2.13E-03	Fugitive Toxics: Cotton Gin - PM Speciation	0.5
7782492	Selenium	7.00E-06	6.31E-02	3.04E-03	Fugitive Toxics: Cotton Gin - PM Speciation	50
7440666	Zinc	3.29E-05	2.97E-01	1.43E-02	Fugitive Toxics: Cotton Gin - PM Speciation	50

Process: 2 Process Description: LPG Combustion - Cotton Gin - Dryers/Burners

Process Rate: 11. Units: 1000 GALLONS BURNED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
42101	Carbon Monoxide	1.88E+00	1.03E-02	9.30E-05	District Cotton Gin Emission Factors	
42603	Oxides of Nitrogen	9.40E+00	5.17E-02	4.65E-04	District Cotton Gin Emission Factors	
16113	Reactive Organic Gas	4.70E-01	2.59E-03	2.32E-05	District Cotton Gin Emission Factors	
42401	Sulfur Dioxide	7.52E-01	4.14E-03	3.72E-05	District Cotton Gin Emission Factors	
124389	Carbon dioxide	1.17E+05	5.82E+02	5.23E+00	GHG: CARB GHG Reg. App A, Tbl 4. Natural Gas (HV=1000 btu/scf)	

74828	Methane	1.98E+00	9.90E-03	8.90E-05	GHG: CARB GHG Reg. App A, Tbl 6. Natural Gas (HV=1000 btu/scf)	
10024972	Nitrous oxide	2.21E-01	1.10E-03	9.89E-06	GHG: CARB GHG Reg. App A, Tbl 6. Natural Gas (HV=1000 btu/scf)	
75070	Acetaldehyde	4.30E-03	4.73E-02	4.25E-04	Toxics: Cotton Gin - Combustion	50
107028	Acrolein	2.70E-03	2.97E-02	2.67E-04	Toxics: Cotton Gin - Combustion	5
71432	Benzene	8.00E-03	8.80E-02	7.91E-04	Toxics: Cotton Gin - Combustion	5
100414	Ethyl benzene	9.50E-03	1.04E-01	9.40E-04	Toxics: Cotton Gin - Combustion	50
50000	Formaldehyde	1.70E-02	1.87E-01	1.68E-03	Toxics: Cotton Gin - Combustion	50
110543	Hexane	6.30E-03	6.93E-02	6.23E-04	Toxics: Cotton Gin - Combustion	50
91203	Naphthalene	3.00E-04	3.30E-03	2.97E-05	Toxics: Cotton Gin - Combustion	50
1151	PAHs, total, w/o individ. co	1.00E-04	1.10E-03	9.89E-06	Toxics: Cotton Gin - Combustion	50
115071	Propylene	7.31E-01	8.04E+00	7.23E-02	Toxics: Cotton Gin - Combustion	50
108883	Toluene	3.66E-02	4.03E-01	3.62E-03	Toxics: Cotton Gin - Combustion	50
1330207	Xylenes (mixed)	2.72E-02	2.99E-01	2.69E-03	Toxics: Cotton Gin - Combustion	

Facility Totals

CAS	Pollutant Name	Emissions			
42101	Carbon Monoxide	5.86E-03	TONS-YR	9.30E-05	TONS-HR
42603	Oxides of Nitrogen	2.93E-02	TONS-YR	4.65E-04	TONS-HR
85101	Particulate Matter 10	9.59E+00	TONS-YR	1.52E-01	TONS-HR
16113	Reactive Organic Gas	1.46E-03	TONS-YR	2.32E-05	TONS-HR
42401	Sulfur Dioxide	2.34E-03	TONS-YR	3.72E-05	TONS-HR
124389	Carbon dioxide	3.30E+02	MT-YR	5.23E+00	MT-HR
74828	Methane	5.61E-03	MT-YR	8.90E-05	MT-HR
10024972	Nitrous oxide	6.23E-04	MT-YR	9.89E-06	MT-HR
75070	Acetaldehyde	2.68E-02	LB-YR	4.25E-04	LB-HR
107028	Acrolein	1.68E-02	LB-YR	2.67E-04	LB-HR
7440382	Arsenic	1.09E-01	LB-YR	1.74E-03	LB-HR
71432	Benzene	4.99E-02	LB-YR	7.91E-04	LB-HR
7440439	Cadmium	1.92E-02	LB-YR	3.04E-04	LB-HR
18540299	Chromium, hexavalent (& compounds)	6.50E-03	LB-YR	1.03E-04	LB-HR
7440508	Copper	4.03E-01	LB-YR	6.39E-03	LB-HR
100414	Ethyl benzene	5.92E-02	LB-YR	9.40E-04	LB-HR
50000	Formaldehyde	1.06E-01	LB-YR	1.68E-03	LB-HR
110543	Hexane	3.93E-02	LB-YR	6.23E-04	LB-HR
7439921	Lead	3.07E-01	LB-YR	4.87E-03	LB-HR
7439965	Manganese	1.92E+00	LB-YR	3.04E-02	LB-HR
91203	Naphthalene	1.87E-03	LB-YR	2.97E-05	LB-HR
7440020	Nickel	1.34E-01	LB-YR	2.13E-03	LB-HR
1151	PAHs, total, w/o individ. components reported	6.23E-04	LB-YR	9.89E-06	LB-HR
115071	Propylene	4.56E+00	LB-YR	7.23E-02	LB-HR
7782492	Selenium	1.92E-01	LB-YR	3.04E-03	LB-HR
108883	Toluene	2.28E-01	LB-YR	3.62E-03	LB-HR
1330207	Xylenes (mixed)	1.70E-01	LB-YR	2.69E-03	LB-HR
7440666	Zinc	9.01E-01	LB-YR	1.43E-02	LB-HR

MT = Metric Ton = 2,204.6 pounds

Facility Emissions Summary

Inventory Year: 2011 County: 10 Facility ID: 27

Facility Name: ALTA VISTA GIN/MURRIETA FARM

Device: 1 Device Name: Cotton Gin

Process: 1 Process Description: Cotton Gin - 500 Lb Bales Cotton

Process Rate: 27398. Units: BALES OF COTTON

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
85101	Particulate Matter 10	7.00E-01	9.59E+00	1.52E-01	District (PTO)	
7440382	Arsenic	3.99E-06	1.09E-01	1.74E-03	Fugitive Toxics: Cotton Gin - PM Speciation	0.5
7440439	Cadmium	7.00E-07	1.92E-02	3.04E-04	Fugitive Toxics: Cotton Gin - PM Speciation	6.205
18540299	Chromium, hexavalent (& co	2.37E-07	6.50E-03	1.03E-04	Fugitive Toxics: Cotton Gin - PM Speciation	0.05
7440508	Copper	1.47E-05	4.03E-01	6.39E-03	Fugitive Toxics: Cotton Gin - PM Speciation	50
7439921	Lead	1.12E-05	3.07E-01	4.87E-03	Fugitive Toxics: Cotton Gin - PM Speciation	5
7439965	Manganese	7.00E-05	1.92E+00	3.04E-02	Fugitive Toxics: Cotton Gin - PM Speciation	50
7440020	Nickel	4.90E-06	1.34E-01	2.13E-03	Fugitive Toxics: Cotton Gin - PM Speciation	0.5
7782492	Selenium	7.00E-06	1.92E-01	3.04E-03	Fugitive Toxics: Cotton Gin - PM Speciation	50
7440666	Zinc	3.29E-05	9.01E-01	1.43E-02	Fugitive Toxics: Cotton Gin - PM Speciation	50

Process: 2 Process Description: LPG Combustion - Cotton Gin - Dryers/Burners

Process Rate: 6.23 Units: 1000 GALLONS BURNED

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
42101	Carbon Monoxide	1.88E+00	5.86E-03	9.30E-05	District Cotton Gin Emission Factors	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Monday, June 18, 2012

Page 1 of 2

42603	Oxides of Nitrogen	9.40E+00	2.93E-02	4.65E-04	District Cotton Gin Emission Factors	
16113	Reactive Organic Gas	4.70E-01	1.46E-03	2.32E-05	District Cotton Gin Emission Factors	
42401	Sulfur Dioxide	7.52E-01	2.34E-03	3.72E-05	District Cotton Gin Emission Factors	
124389	Carbon dioxide	1.17E+05	3.30E+02	5.23E+00	GHG: CARB GHG Reg. App A, Tbl 4. Natural Gas (HV=1000 btu/scf)	
74828	Methane	1.98E+00	5.61E-03	8.90E-05	GHG: CARB GHG Reg. App A, Tbl 6. Natural Gas (HV=1000 btu/scf)	
10024972	Nitrous oxide	2.21E-01	6.23E-04	9.89E-06	GHG: CARB GHG Reg. App A, Tbl 6. Natural Gas (HV=1000 btu/scf)	
75070	Acetaldehyde	4.30E-03	2.68E-02	4.25E-04	Toxics: Cotton Gin - Combustion	50
107028	Acrolein	2.70E-03	1.68E-02	2.67E-04	Toxics: Cotton Gin - Combustion	5
71432	Benzene	8.00E-03	4.99E-02	7.91E-04	Toxics: Cotton Gin - Combustion	5
100414	Ethyl benzene	9.50E-03	5.92E-02	9.40E-04	Toxics: Cotton Gin - Combustion	50
50000	Formaldehyde	1.70E-02	1.06E-01	1.68E-03	Toxics: Cotton Gin - Combustion	50
110543	Hexane	6.30E-03	3.93E-02	6.23E-04	Toxics: Cotton Gin - Combustion	50
91203	Naphthalene	3.00E-04	1.87E-03	2.97E-05	Toxics: Cotton Gin - Combustion	50
1151	PAHs, total, w/o individ. co	1.00E-04	6.23E-04	9.89E-06	Toxics: Cotton Gin - Combustion	50
115071	Propylene	7.31E-01	4.56E+00	7.23E-02	Toxics: Cotton Gin - Combustion	50
108883	Toluene	3.66E-02	2.28E-01	3.62E-03	Toxics: Cotton Gin - Combustion	50
1330207	Xylenes (mixed)	2.72E-02	1.70E-01	2.69E-03	Toxics: Cotton Gin - Combustion	

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Monday, June 18, 2012

Page 2 of 2

RECEIVED

JUN 07 2012

Permits Services



SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT SJVAPCD

1990 E. Gettysburg Ave., Fresno, CA 93726

/ Electronic

(559) 230 - 6000 FAX: (559) 230 - 6061

District Bcode 2

WORKSHEET FOR THE ANNUAL EMISSION INVENTORY : 2011

ALTA VISTA GIN/MURRIETA FARM

5854 S SAN DIEGO

MENDOTA CA, 93640

FACILITY ID#: C-27

TAD #: 10-27

SIC #: 724

PHONE #: (559) 655-3370

TOXID: 40159

US Form Required: No

SITE ADDRESS: 5854 S SAN DIEGO, MENDOTA

Is this information considered:

- ☐ CONFIDENTIAL
☐ NOT CONFIDENTIAL

Note: All requests for confidentiality must be supported by a written justification (Title 17, section 91010, California Administrative Code)

fee for electronic

WorkSheet for Permit #: C-27-1-3

COTTON GIN WITH TRUCK UNLOADING, COTTON DRYING, SEED DELINTING, LINT CLEANING, SEED STORAGE FACILITIES, SERVED BY 32 1D-3D CYCLONES

COTTON GINS

Annual Process Data:

Number of STD. 500 Lb Bales for Last Season: 27398

Fuel Combustion Data:

Primary Fuel (circle one) NG, Diesel, LPG Other: _____

Annual Usage: 62338

Units (circle one) SCF, BTU, Therms, Gals Other: _____

Secondary Fuel (circle one) NG, Diesel, LPG, Other: _____

Annual Usage: _____

Units (circle one) SCF, BTU, Therms, Gals, Other: _____

Length of Operating Season In Days - 63

Duration in months (e.g. from October Through January)

From Oct Through Dec

Distance to Nearest Business from Equipment 2.8 miles (feet)

Distance to Nearest Residence from Equipment 250 (feet)

Comments: _____

PM
0.07 lb/bale

Facility Wide Relative Monthly Activity

If the facility has the same operating schedule year round, then please check the box next to the Default Monthly Activity. Otherwise provide the relative monthly activity expressed in percentage that the facility operates each month. Note: $100\%/12 = 8.3\%$.

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
☐ DEFAULT MONTHLY ACTIVITY	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3
☐ MONTHLY RELATIVE ACTIVITY										13.8	44.8	41.9

Daily Activity

Please indicate with a circles the normal operating schedule:

Hours per day: 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24
 Days per week: Sunday Monday Tuesday Wednesday Thursday Friday Saturday

General Information

If your facility has unpaved traffic areas please complete the following section. An unpaved traffic area is any nonresidential area that is not covered by asphalt, recycled asphalt, asphaltic concrete, concrete, or concrete pavement that is used for fueling and servicing; shipping, receiving and transfer; or parking or storing equipment, haul trucks, vehicles, and any conveyances.

UNPAVED TRAFFIC AREAS

Size of Unpaved Traffic Areas (sum of all areas): 20

Units (circle one): Square feet, Acres

Average Number of Vehicles Entering the Unpaved Areas Per Day: 3.8

Responsible Official Information

Questionnaire Answered By, Title	LLOYD HENDRICKSON
Telephone Number	(559) 655-3370
Responsible Official	LLOYD HENDRICKSON
Responsible Official Telephone Number	(559) 655-3370
Responsible Official Signature	<i>Lloyd Hendrickson</i>
Date	6-7-12

Facility Totals

CAS	Pollutant Name	Emissions			
42101	Carbon Monoxide	2.63E-02	TONS-YR	9.30E-05	TONS-HR
42603	Oxides of Nitrogen	1.32E-01	TONS-YR	4.65E-04	TONS-HR
85101	Particulate Matter 10	8.45E+00	TONS-YR	1.52E-01	TONS-HR
16113	Reactive Organic Gas	6.58E-03	TONS-YR	2.32E-05	TONS-HR
42401	Sulfur Dioxide	1.05E-02	TONS-YR	3.72E-05	TONS-HR
75070	Acetaldehyde	1.20E-01	LB-YR	4.25E-04	LB-HR
107028	Acrolein	7.56E-02	LB-YR	2.67E-04	LB-HR
7440382	Arsenic	9.63E-02	LB-YR	1.74E-03	LB-HR
71432	Benzene	2.24E-01	LB-YR	7.91E-04	LB-HR
7440439	Cadmium	1.69E-02	LB-YR	3.04E-04	LB-HR
18540299	Chromium, hexavalent (& compounds)	5.73E-03	LB-YR	1.03E-04	LB-HR
7440508	Copper	3.55E-01	LB-YR	6.39E-03	LB-HR
100414	Ethyl benzene	2.66E-01	LB-YR	9.40E-04	LB-HR
50000	Formaldehyde	4.76E-01	LB-YR	1.68E-03	LB-HR
110543	Hexane	1.76E-01	LB-YR	6.23E-04	LB-HR
7439921	Lead	2.70E-01	LB-YR	4.87E-03	LB-HR
7439965	Manganese	1.69E+00	LB-YR	3.04E-02	LB-HR
91203	Naphthalene	8.40E-03	LB-YR	2.97E-05	LB-HR
7440020	Nickel	1.18E-01	LB-YR	2.13E-03	LB-HR
1151	PAHs, total, w/o individ. components reported	2.80E-03	LB-YR	9.89E-06	LB-HR
115071	Propylene	2.05E+01	LB-YR	7.23E-02	LB-HR
7782492	Selenium	1.69E-01	LB-YR	3.04E-03	LB-HR
108883	Toluene	1.02E+00	LB-YR	3.62E-03	LB-HR
1330207	Xylenes (mixed)	7.62E-01	LB-YR	2.69E-03	LB-HR
7440666	Zinc	7.94E-01	LB-YR	1.43E-02	LB-HR

MT = Metric Ton = 2,204.6 pounds

Facility Emissions Summary

Inventory Year: 2012

County: 10

Facility ID: 27

Facility Name: ALTA VISTA GIN/MURRIETA FARM

Device: 1 Device Name: Cotton Gin

Process: 1 Process Description: Cotton Gin - 500 Lb Bales Cotton

Process Rate: 2.41E+04 Units: BALES OF COTTON

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
7440382	Arsenic	3.99E-06	9.63E-02	1.74E-03	Fugitive Toxics: Cotton Gin - PM Speciation	0.005
7440439	Cadmium	7.00E-07	1.69E-02	3.04E-04	Fugitive Toxics: Cotton Gin - PM Speciation	0.005
18540299	Chromium, hexavalent (& co	2.37E-07	5.73E-03	1.03E-04	Fugitive Toxics: Cotton Gin - PM Speciation	0.00005
7440508	Copper	1.47E-05	3.55E-01	6.39E-03	Fugitive Toxics: Cotton Gin - PM Speciation	0.05
7439921	Lead	1.12E-05	2.70E-01	4.87E-03	Fugitive Toxics: Cotton Gin - PM Speciation	0.25
7439965	Manganese	7.00E-05	1.69E+00	3.04E-02	Fugitive Toxics: Cotton Gin - PM Speciation	0.05
7440020	Nickel	4.90E-06	1.18E-01	2.13E-03	Fugitive Toxics: Cotton Gin - PM Speciation	0.05
85101	Particulate Matter 10	7.00E-01	8.45E+00	1.52E-01	District (PTO)	
7782492	Selenium	7.00E-06	1.69E-01	3.04E-03	Fugitive Toxics: Cotton Gin - PM Speciation	0.25
7440666	Zinc	3.29E-05	7.94E-01	1.43E-02	Fugitive Toxics: Cotton Gin - PM Speciation	1

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Monday, April 23, 2018

Page 1 of 2

Process: 2 **Process Description: LPG Combustion - Cotton Gin - Dryers/Burners**

Process Rate: 2.80E+01 **Units: 1000 GALLONS BURNED**

CAS	Pollutant	Emission Factor	Yearly Emissions	Hourly Emissions	Memo	1/2 App Deg
75070	Acetaldehyde	4.30E-03	1.20E-01	4.25E-04	Toxics: Cotton Gin - Combustion	10
107028	Acrolein	2.70E-03	7.56E-02	2.67E-04	Toxics: Cotton Gin - Combustion	0.025
71432	Benzene	8.00E-03	2.24E-01	7.91E-04	Toxics: Cotton Gin - Combustion	1
42101	Carbon Monoxide	1.88E+00	2.63E-02	9.30E-05	District Cotton Gin Emission Factors	
100414	Ethyl benzene	9.50E-03	2.66E-01	9.40E-04	Toxics: Cotton Gin - Combustion	100
50000	Formaldehyde	1.70E-02	4.76E-01	1.68E-03	Toxics: Cotton Gin - Combustion	2.5
110543	Hexane	6.30E-03	1.76E-01	6.23E-04	Toxics: Cotton Gin - Combustion	100
91203	Naphthalene	3.00E-04	8.40E-03	2.97E-05	Toxics: Cotton Gin - Combustion	0.05
42603	Oxides of Nitrogen	9.40E+00	1.32E-01	4.65E-04	District Cotton Gin Emission Factors	
1151	PAHs, total, w/o individ. com	1.00E-04	2.80E-03	9.89E-06	Toxics: Cotton Gin - Combustion	25
115071	Propylene	7.31E-01	2.05E+01	7.23E-02	Toxics: Cotton Gin - Combustion	100
16113	Reactive Organic Gas	4.70E-01	6.58E-03	2.32E-05	District Cotton Gin Emission Factors	
42401	Sulfur Dioxide	7.52E-01	1.05E-02	3.72E-05	District Cotton Gin Emission Factors	
108883	Toluene	3.66E-02	1.02E+00	3.62E-03	Toxics: Cotton Gin - Combustion	100
1330207	Xylenes (mixed)	2.72E-02	7.62E-01	2.69E-03	Toxics: Cotton Gin - Combustion	100

Note: Toxic emissions are reported in pounds, criteria emissions in tons, and greenhouse gas emissions in metric tons.

Monday, April 23, 2018

Page 2 of 2



SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

1990 E. Gettysburg Ave., Fresno, CA 93726

/ Electronic

(559) 230 - 6000 FAX: (559) 230 - 6061

District BCode: 2

SURVEY FOR THE ANNUAL EMISSION INVENTORY : 2012

ALTA VISTA GIN/MURRIETA FARM
5854 S SAN DIEGO
MENDOTA, CA 93640

FACILITY ID# : C-27
TAD #: 10-27
SIC #: 724
PHONE #: (559) 655-3222

SITE ADDRESS:

ALTA VISTA GIN/MURRIETA FARM
5854 S SAN DIEGO, MENDOTA

This information is considered:

- ☐ CONFIDENTIAL*
☒ NOT CONFIDENTIAL

*NOTE: To be considered confidential, request MUST be supported by written justification (per Title 17, section 91010, California Administrative Code).

WorkSheet for Permit # : C-27-1-3

COTTON GIN WITH TRUCK UNLOADING, COTTON DRYING, SEED DELINTING, LINT CLEANING, SEED STORAGE FACILITIES,
SERVED BY 36 1D-3D CYCLONES

COTTON GINS

Annual Process Data:

Number of STD. 500 Lb Bales for Last Season: 24,146

Fuel Combustion Data:

Primary Fuel (circle one) NG, Diesel, LPG, Other: Propane

Annual Fuel Usage: 28,000

Units (circle one) SCF, BTU, Therms, Gals, Other: _____

(If applicable) Secondary Fuel (circle one) NG, Diesel, LPG, Other: _____

Annual Fuel Usage: _____

Units (circle one) SCF, BTU, Therms, Gals, Other: _____

Length of Operating Season In Days: 92 days

Duration in months (e.g. from October Through January)

From Oct Through Dec

Comments: _____

Facility Wide Relative Monthly Activity

If the facility has same operating schedule year round, then please check the Default Monthly Activity box. Otherwise, provide the percentage and months the facility operates. The total percentage for the year must add up to 100%. (100% / 12 = 8.3)

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
DEFAULT MONTHLY ACTIVITY	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3	8.3
RELATIVE MONTHLY ACTIVITY										33.33	33.33	33.33

Facility Daily Schedule

Please indicate with circles the normal operating schedule:

Hours per day: 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24
 Days per week: Sunday Monday Tuesday Wednesday Thursday Friday Saturday

Responsible Official Information

Questionnaire Answered By, Title	Partner
Telephone Number	209-827-7700
Responsible Official	Laurel Skinner
Responsible Official Telephone Number	209-827-7700
Responsible Official Signature	Laurel Skinner
Date	April 20, 2018

Emission Statement - Calendar Year 2012 Emissions

Date / Time Printed 04/23/2018 / 6:56:11 AM

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

Facility ID # C - 27
TAD # 10 - 27
SIC # 724
Facility Name ALTA VISTA GIN/MURRIETA FARM
TOXID # 40159
Planning Inventory / Electronic
Update Summary ☐

UTM Zone : 10
UTM East: 728.651
UTM North: 4059.13

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL ☐

DELETED

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Units Source Classification Code	NOX Lb / Unit	VOC Lb / Unit	SOX Lb / Unit	CO Lb / Unit	PM10 Lb / Unit	NH3* Lb / Unit	
1	1	Cotton Gin - 500 Lb Bales Cotton	24146	BALES OF COTTON	.0	.0	.0	.0	.7	.0	
				30200410	.0	.0	.0	.0	8.45	.0	(Tons/Yr)
1	2	LPG Combustion - Cotton Gin - Dryers/Burners	28	1000 GALLONS BURNED	9.4	.47	.75	1.88	.0	.0	
				30290005	.13	.01	.01	.03	.0	.0	(Tons/Yr)
Totals For the Facility (TONS / YEAR)					.13	.01	.01	.03	8.45	.0	

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

Contact	Laurel Skinner	Name and Title of Responsible Official	I certify that the information contained in the Emission Statement is accurate to the best of my knowledge.
Company	ALTA VISTA GIN/MURRIETA FARM		
Address	5854 S SAN DIEGO		
City,State,Zip	MENDOTA CA 93640		
Telephone	(209) 827 - 7700		
Email:			
Location of facility if different from above	ALTA VISTA GIN/MURRIETA FARM		
	5854 S SAN DIEGO		
	MENDOTA, CA 93640		

Signature of Responsible Official and Date

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

**SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT
SUPPLEMENTAL APPLICATION FORM**

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

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

Certificate to be Issued to: <u>Turner Island Farms</u>
Gin Location: <u>5854 S San Diego Mendota Ca</u>

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

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

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

If "yes", please list the applicable Permit to Operate number(s):

C - 27

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: 5 / 15 / 2017

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	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>
Start MM/DD/YY	<u>10-18-2012</u>	<u>10-14-2013</u>	<u>11-4-2014</u>	<u>10-14-2015</u>	<u>10-18-2016</u>
End MM/DD/YY	<u>12-10-2012</u>	<u>11-29-2013</u>	<u>12-13-2014</u>	<u>12-23-2015</u>	<u>12-24-2016</u>
No. of Bales*	<u>24146</u>	<u>9015</u>	<u>7637</u>	<u>13151</u>	<u>11807</u>

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

(Please continue on other side)

SACG-2 8/93

Alta Vista Gin

Propane

2012	28000	Gals
2013	11000	Gals
2014	5500	Gals
2015	14000	Gals
2016	13000	Gals

ATT: Robert Gilles

Attachment D

GHG Emission Factors (EFs) and Global Warming Potentials (GWP)

ELECTRONIC CODE OF FEDERAL REGULATIONS

e-CFR data is current as of June 28, 2017

Title 40 → Chapter I → Subchapter C → Part 98 → Subpart C → Appendix

Title 40: Protection of Environment
PART 98—MANDATORY GREENHOUSE GAS REPORTING
Subpart C—General Stationary Fuel Combustion Sources

TABLE C-1 TO SUBPART C OF PART 98—DEFAULT CO₂ EMISSION FACTORS AND HIGH HEAT VALUE OF FUEL

Link to an amendment published at 81 FR 89252, Dec. 9, 2016.

DEFAULT CO₂ EMISSION FACTORS AND HIGH HEAT VALUES FOR VARIOUS TYPE

Fuel type	Default high heat value
Coal and coke	mmBtu/short ton
Anthracite	25.09
Bituminous	24.93
Subbituminous	17.25
Lignite	14.21
Coal Coke	24.80
Mixed (Commercial sector)	21.39
Mixed (Industrial coking)	26.28
Mixed (Industrial sector)	22.35
Mixed (Electric Power sector)	19.73
Natural gas	mmBtu/scf
(Weighted U.S. Average)	1.026×10^{-3}
Petroleum products	mmBtu/gallon
Distillate Fuel Oil No. 1	0.139
Distillate Fuel Oil No. 2	0.138
Distillate Fuel Oil No. 4	0.146
Residual Fuel Oil No. 5	0.140
Residual Fuel Oil No. 6	0.150
Used Oil	0.138
Kerosene	0.135
Liquefied petroleum gases (LPG) ¹	0.092
Propane ¹	0.091
Propylene ²	0.091

Ethane ¹	0.068
Ethanol	0.084
Ethylene ²	0.058
Isobutane ¹	0.099
Isobutylene ¹	0.103
Butane ¹	0.103
Butylene ¹	0.105
Naphtha (<401 deg F)	0.125
Natural Gasoline	0.110
Other Oil (>401 deg F)	0.139
Pentanes Plus	0.110
Petrochemical Feedstocks	0.125
Petroleum Coke	0.143
Special Naphtha	0.125
Unfinished Oils	0.139
Heavy Gas Oils	0.148
Lubricants	0.144
Motor Gasoline	0.125
Aviation Gasoline	0.120
Kerosene-Type Jet Fuel	0.135
Asphalt and Road Oil	0.158
Crude Oil	0.138
Other fuels—solid	mmBtu/short ton
Municipal Solid Waste	9.95 ³
Tires	28.00
Plastics	38.00
Petroleum Coke	30.00
Other fuels—gaseous	mmBtu/scf
Blast Furnace Gas	0.092×10^{-3}
Coke Oven Gas	0.599×10^{-3}
Propane Gas	2.516×10^{-3}
Fuel Gas ⁴	1.388×10^{-3}
Biomass fuels—solid	mmBtu/short ton
Wood and Wood Residuals (dry basis) ⁵	17.48
Agricultural Byproducts	8.25
Peat	8.00
Solid Byproducts	10.39
Biomass fuels—gaseous	mmBtu/scf
Landfill Gas	0.485×10^{-3}
Other Biomass Gases	0.655×10^{-3}
Biomass Fuels—Liquid	mmBtu/gallon
Ethanol	0.084
Biodiesel (100%)	0.128
Rendered Animal Fat	0.125
Vegetable Oil	0.120

¹The HHV for components of LPG determined at 60 °F and saturation pressure with the exce

²Ethylene HHV determined at 41 °F (5 °C) and saturation pressure.

³Use of this default HHV is allowed only for: (a) Units that combust MSW, do not generate steam, and do not use Tier 1; (b) units that derive no more than 10 percent of their annual heat input from MSW and batch incinerators that combust no more than 1,000 tons of MSW per year.

⁴Reporters subject to subpart X of this part that are complying with §98.243(d) or subpart Y of this part use the default HHV and the default CO₂ emission factor for fuel gas combustion under the conditions (2)(i) and (d)(2)(ii) and §98.252(a)(1) and (a)(2), respectively. Otherwise, reporters subject to subpart Z use either Tier 3 (Equation C-5) or Tier 4.

⁵Use the following formula to calculate a wet basis HHV for use in Equation C-1: $HHV_w = ((100 - M) / 100) \times HHV_d$, where HHV_w = wet basis HHV, M = moisture content (percent) and HHV_d = dry basis HHV from Table C-1.

[78 FR 71950, Nov. 29, 2013]

Need assistance?

ELECTRONIC CODE OF FEDERAL REGULATIONS

e-CFR data is current as of June 28, 2017

Title 40 → Chapter I → Subchapter C → Part 98 → Subpart C → Appendix

Title 40: Protection of Environment
PART 98—MANDATORY GREENHOUSE GAS REPORTING
Subpart C—General Stationary Fuel Combustion Sources

TABLE C-2 TO SUBPART C OF PART 98—DEFAULT CH₄ AND N₂O EMISSION FACTORS FOR VARIOUS FUEL TYPES

Link to an amendment published at 81 FR 89252, Dec. 9, 2016.

Fuel type	Default CH ₄ emission factor (kg CH ₄ /mmBtu)	Default N ₂ O emission factor (kg N ₂ O/mmBtu)
Coal and Coke (All fuel types in Table C-1)	1.1×10^{-02}	1.6×10^{-0}
Natural Gas	1.0×10^{-03}	1.0×10^{-0}
Petroleum (All fuel types in Table C-1)	3.0×10^{-03}	6.0×10^{-0}
Fuel Gas	3.0×10^{-03}	6.0×10^{-0}
Municipal Solid Waste	3.2×10^{-02}	4.2×10^{-0}
Tires	3.2×10^{-02}	4.2×10^{-0}
Blast Furnace Gas	2.2×10^{-05}	1.0×10^{-0}
Coke Oven Gas	4.8×10^{-04}	1.0×10^{-0}
Biomass Fuels—Solid (All fuel types in Table C-1, except wood and wood residuals)	3.2×10^{-02}	4.2×10^{-0}
Wood and wood residuals	7.2×10^{-03}	3.6×10^{-0}
Biomass Fuels—Gaseous (All fuel types in Table C-1)	3.2×10^{-03}	6.3×10^{-0}
Biomass Fuels—Liquid (All fuel types in Table C-1)	1.1×10^{-03}	1.1×10^{-0}

Note: Those employing this table are assumed to fall under the IPCC definitions of the “Energy and Manufacturing Industries and Construction”. In all fuels except for coal the values for these two categories are the same. For coal combustion, those who fall within the IPCC “Energy Industry” category may employ a value of 1.6×10^{-0} kg N₂O/mmBtu.

[78 FR 71952, Nov. 29, 2013]

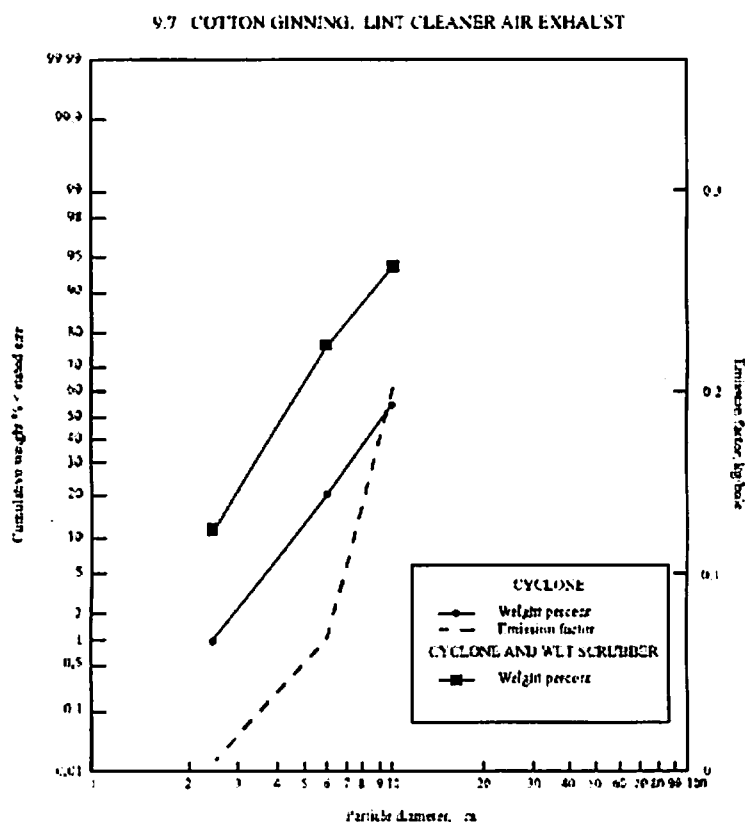
Need assistance?

Attachment E

PM_{2.5} Fraction

PM_{2.5} Fraction from EPA AP-42 Section 9.7 Appendix B-1

9.7 COTTON GINNING: LINT CLEANER AIR EXHAUST



Aerodynamic particle diameter, μm	Cumulative wt % standard air		Emission factor, kg/bale
	After cyclone	After cyclone & wet scrubber	
2.5	1	11	0.004
6.0	20	74	0.07
10.0	54	92	0.20

Lint cleaners are the largest source of emissions from the cotton ginning process. Therefore, the PM_{2.5} fraction of the PM₁₀ 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:

$$PM_{2.5} \text{ Fraction} = \frac{\frac{1 \text{ lb } PM_{2.5}}{\text{lb } PM}}{\frac{54 \text{ lb } PM_{10}}{\text{lb } PM}} \times 100\% = 1.851 \rightarrow 1.9\% \frac{PM_{2.5}}{PM_{10}}$$

Attachment F

Draft ERC Certificates

San Joaquin Valley
Air Pollution Control District

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

Emission Reduction Credit Certificate

C1171943-92-1

ISSUED TO: ALTA VISTA GIN/MURRIETA FARM
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 5854 S SAN DIEGO
MENDOTA, CA 93640

For VOC Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	6 lbs

Method Of Reduction

- ☒ Shutdown of Entire Stationary Source
☐ Shutdown of Emissions Units
☐ Other

The shutdown of 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

Arnaud Marjollet, 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

C1171943-92-2

ISSUED TO: ALTA VISTA GIN/MURRIETA FARM
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 5854 S SAN DIEGO
MENDOTA, CA 93640

For NOx Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	171 lbs

Method Of Reduction

- ☒ Shutdown of Entire Stationary Source
☐ Shutdown of Emissions Units
☐ Other

The shutdown of 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

Arnaud Marjollet, 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

C1171943-92-3

ISSUED TO: ALTA VISTA GIN/MURRIETA FARM
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 5854 S SAN DIEGO
MENDOTA, CA 93640

For CO Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	24 lbs

Method Of Reduction

- ☒ Shutdown of Entire Stationary Source
☐ Shutdown of Emissions Units
☐ Other

The shutdown of 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

Arnaud Marjollet, 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

C1171943-92-4

ISSUED TO: ALTA VISTA GIN/MURRIETA FARM
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 5854 S SAN DIEGO
MENDOTA, CA 93640

For PM10 Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	7,858 lbs

Portion of above PM10 Reductions that is PM2.5:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
0.0%	0.0%	0.0%	1.9%
None	None	None	149 lbs

Method Of Reduction

- ☒ Shutdown of Entire Stationary Source
☐ Shutdown of Emissions Units
☐ Other

The shutdown of 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

Arnaud Marjollet, 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

C1171943-92-5

ISSUED TO: ALTA VISTA GIN/MURRIETA FARM
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 5854 S SAN DIEGO
MENDOTA, CA 93640

For SOx Reductions In The Amount Of:

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

Method Of Reduction

- ☒ Shutdown of Entire Stationary Source
☐ Shutdown of Emissions Units
☐ Other

The shutdown of 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

Arnaud Marjollet, 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

C1171943-92-24

ISSUED TO: ALTA VISTA GIN/MURRIETA FARM
ISSUED DATE: <DRAFT>
LOCATION OF REDUCTION: 5854 S SAN DIEGO
MENDOTA, CA 93640

For CO2E Reductions In The Amount Of:

79 metric tons / year

Method Of Reduction

- ☒ Shutdown of Entire Stationary Source
☐ Shutdown of Emissions Units
☐ Other

The shutdown of cotton gin

Emission Reduction Qualification Criteria

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services