

**San Joaquin Valley
Unified Air Pollution Control District
Permit Services Division**

Cotton Gins - Actions Requiring Permits

Approved By: _____ <i>Signed</i>	Date: _____ <i>4/17/97</i>
Seyed Sadredin Director of Permit Services	

Purpose: To provide guidelines for District staff, industry representatives, and other interested parties on the type of actions at existing cotton ginning facilities that may be subject to District permitting requirements. This policy establishes the criteria for determining the need for obtaining permits, as well as specific examples of actions that do or do not require permits. To facilitate easier decision making regarding permit requirements, this policy will identify various actions that may fall under one of the following categories:

1. Actions requiring Authority to Construct (ATC)
2. Actions requiring written notification of the District
3. Actions not requiring ATC or a Written Notification

Furthermore, this policy will provide for added flexibility to the sources to make changes by limiting unnecessary specificity in the permitted equipment description.

Cotton ginners referring to this policy should use it to guide their actions with respect to permitting decisions, especially during the cotton ginning season when there may be limited time for communicating with the District. However, to avoid confusion and violation of District rules and regulations, all users of this policy are encouraged to contact the District for clarification of any questionable issues.

I. Background:

The cotton ginning industry is a seasonal processing industry characterized by a short and hectic ginning season of 30 to 120 days, generally within the range of October through January. A cotton gin is a continuous processing line, accepting field cotton at one end and producing 500-pound bales of cleaned cotton at the other end. Any failure of equipment along that line generally shuts the entire gin down.

Failures of fan motors, module feeders, etc., during the gin's processing season must therefore be remedied immediately. This policy is intended to clarify what types changes can be made at a cotton gin without a permit.

II. Proper Equipment Description for Cotton Gin Permits

The equipment description should include description, quantity, and the type of major components which are sources of air contaminants. The total horsepower rating, individual component horsepower rating, and fan manufacturer or model description should not be included in the permit description.

For billing purposes, the horsepower ratings will be maintained in the District's billing records. The description and specification of the control devices will be cited in permit conditions.

An example of proper equipment description and permit conditions are as follows:

"COTTON GIN WITH 8 EA. LUMMIS A1 ROLLER GIN STANDS, 2 EA. HOT AIR CLEANERS, 6 EA. LINT CLEANERS AND CONDENSERS (1ST, 2ND STAGE) WITH 2 EA. 3 MMBTU/HR DRYERS, MOTE SYSTEM, BATTERY CONDENSER, TRASH SYSTEM."

1. *The gin stand feeders shall be controlled by one 56" 1D-3D cyclone.*

For all existing facilities, at the time of annual billing renewal, the District will revise the equipment description to allow the added flexibility as described above. For new or modified facilities, the above criteria will be incorporated into the permit at the time of issuance.

III. Criteria for Establishing the Need for Permit

A prior District approval in the form of an ATC is required if the modification or “repair” results in any one of the following:

- A. Increase or decrease in air flow rate
- B. Increase or decrease in permitted emissions
- C. A change in permitted equipment rating or description as written on the permit
- D. A change in control equipment design
- E. Increase or decrease in permitted throughput (bailing rate) or other operational limits
- F. A change to any permit conditions on the existing permit

IV. Actions Requiring ATC

An ATC shall be required for any repair or modification that results in a change as outlined in section III of this policy. Examples of such changes include but are not limited to the following:

- Replacing 2D-2D cyclones with 1D-3D cyclones
- Replacing a fan which changes (decreases or increases) air flow
- Adding a gin stand or other emitting equipment
- Adding a cyclone
- Adding a plenum

V. Actions Requiring Written Notification but not an ATC

For modifications or repairs that do not result in any of the changes outlined in section III of this policy, the permittee may implement the change without an ATC provided that a written notification is sent to the District within 14 days from the date the modification or repair is made. The notification must contain all information necessary to demonstrate to the satisfaction of the District that the criteria specified in section III are satisfied. The source will be subject to enforcement action for failure to obtain permits if any one of the following is true:

- A. The source fails to provide the District with written notification of the change.
- B. The data supplied by the source does not demonstrate to the satisfaction of the District that the criteria in section III of this policy is satisfied.

Examples of actions that would require a written notification but can be implemented without ATC are as follows:

- Identical Replacements: See District rule 2201 for definition.
- Replacement of a fan with another model or manufacturer's brand with equivalent CFM rating
- Addition of a mote baler
- Installation of a module feeder
- Relocation of equipment within the same ginning operation
- Replacing an existing motor with one of different horsepower rating without affecting air flow or production rate
- Replacement of a screw conveyor with one of different size without affecting throughput rate

VI. Modification or "Repairs" not Requiring ATC or Written Notification

The following actions shall not require an ATC or a written notification:

- Replacing a bale press with one of identical horsepower and baling rate
- Replacing worn or faulty parts
- Planting trees as a windbreak
- Patching holes in cyclones and duct works. (Must comply with equipment breakdown notification requirements.)

VII. Other Changes

This policy does not contain a complete list of all possible changes that may occur at a typical cotton ginning facility. A case-by-case analysis may be required to determine if the criteria in section III of this policy are met for cases not specified above. In such cases, the permittee should provide the District with adequate information to establish the need for a permit prior to implementing the change.