San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

November 4, 2026

Phil Barrett
Anderson Clayton Corp/Silver Creek #1
1785 N Fine Ave
Fresno, CA 93727

Re: Notice of Preliminary Decision – Emission Reduction Credits
Facility Number: C-1385
Project Number: C-1261347

Dear Mr. Barrett:

Enclosed for your review and comment is the District's analysis of Anderson Clayton Corp/Silver Creek #1's application for Emission Reduction Credits (ERCs) resulting from the shut down of an existing cotton ginning operation (permit C-1385-1-10), located at 43939 North Avenue, Firebaugh, CA. The quantity of ERCs proposed for banking is 706 lb-NOx/yr, 20 lb-SOx/yr, 15,921 lb-PM10/yr, 2,547 lb-PM2.5/yr, 141 lb-CO/yr, and 39 lb-VOC/yr.

The notice of preliminary decision for this project has been posted on the District's website (https://www.valleyair.org/public-meetings-and-participation/public-notices/). After addressing all comments made during the 30-day public notice comment period, the District intends to the 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. Zeferino Aleman of Permit Services at (559) 230-5844.

Sincerely,

Brian Clements
Director of Permit Services

BC:za

Enclosures

cc: Courtney Graham, CARB (w/ enclosure) via email
cc: EPA Region 9 Air Permitting Manager (w/ enclosure) via EPS

Samir Sheikh
Executive Director/Air Pollution Control Officer

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San Joaquin Valley Air Pollution Control District

ERC Banking Application Review

Shutdown of Cotton Ginning Operation

Facility Name:	Anderson Clayton Corp/Silver Creek #1	Date:	November 4, 2026
Mailing Address:	43939 North Ave Firebaugh, CA 93622	Engineer:	Zeferino Aleman
		Lead Engineer:	Dustin Brown
Contact Person:	Phil Barrett		
Telephone:	(469) 607-5323		
E-Mail:	Phil.barrett@olamagri.com		
Application Received:	March 23, 2026		
Deemed Complete:	May 19, 2026		
Project Number:	C-1261347		
ERC Certificate Numbers:	C-1598-1, '-2, '-3, '-4, '-5, and '-22		

I. Summary

Anderson Clayton Corp/Silver Creek #1 operated a cotton ginning facility in Firebaugh, CA. On March 23, 2026, the District received an application from the operator of the cotton gin to request Emission Reduction Credits (ERCs) for VOC, NOx, CO, PM_{10}, and SOx for the shutdown of this cotton ginning facility permitted under C-1385-1-10. The submission of this ERC banking application will serve as the date of surrender for Permit to Operate (PTO) C-1385-1-10. A copy of the surrendered Permit to Operate (PTO) is attached (see Attachment A) and the permit has been cancelled. During the last season of operation in 2024, the facility processed 22,449 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)	Total ERCs (lb/year)
NOx	0	0	0	706	706
SOx	0	0	0	20	20
PM_{10}	0	0	0	15,921	15,921
$PM_{2.5}$	0	0	0	2,547	2,547
CO	0	0	0	141	141
VOC	0	0	0	39	39

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/20/23)
Rule 2301	Emission Reduction Credit Banking (4/20/23)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4202	Particulate Matter – Emission Rate (12/17/92)
Rule 4204	Cotton Gins (2/17/05)
Rule 4301	Fuel Burning Equipment (12/17/92)
Rule 4309	Dryers, Dehydrators, and Ovens (12/15/05)
Rule 4801	Sulfur Compounds (12/17/92)

III. Project Location

The emissions units associated with this cotton gin operation were previously operated and located at 43939 North Ave in Firebaugh, CA.

IV. Method of Generating Reductions

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

C-1385-1-10: COTTON GIN (SILVER CREEK #1) WITH WAGON SUCTION, MODULE FEEDER, TWENTY LUMMUS ROLLER GINS, SIX HOT AIR CLEANERS (1ST, 2ND, 3RD STAGE) WITH SIX 3.0 MMBTU/HR NATURAL GAS-FIRED BURNERS, ONE 1.5 MMBTU/HR NATURAL GAS-FIRED BATTERY CONDENSER HUMIDIFIER BURNER, ONE 1.0 MMBTU/HR NATURAL GAS-FIRED LINT SLIDE BURNER, OVERFLOW, SUPER JET LINT CLEANERS, CONDENSERS (1ST, 2ND STAGE), BATTERY CONDENSER, AND A TRASH SYSTEM

The gin was limited by permit condition to a not exceed 176.2 tons of baled cotton/day (708 bales/day, corrected to 500 lb bales). PTO C-1385-1-10 was surrendered on March 23, 2026.

V. Calculations

A. Assumptions

Particulate Emissions from Ginning Operation:

- Annual criteria pollutant emissions are rounded to the nearest pound (District practice).
- Ginning rate not to exceed 176.2 tons of baled cotton/day (708 bales/day, corrected to 500 lb bales) (permit limit).
- Based on information provided by the applicant for the five seasons prior to the shutdown (from 2021 to 2025), shown below, the typical operating schedule was 24 hours per day and 57 days average per year in the fourth quarter. However, 2025 will not be included in the determining the five year average as that year did not represent their typical operations since they did not operate during that season.
- $PM_{2.5}$ fraction (% of the PM_{10} that is also $PM_{2.5}$) = 16% ("Characterization of Cotton Gin Particulate Matter Emissions". United States Department of Agriculture, Agricultural Research Service)[1].

Cotton Gin Operating Dates					
Season	2021	2022	2023	2024	2025
Start date	October 20, 2021	October 20, 2022	November 2, 2023	October 15, 2024	n/a
End date	December 8, 2021	December 13, 2022	December 20, 2023	December 28, 2024	n/a
4th Quarter days	50	55	49	75	0
No. of Bales	17,549	22,075	17,754	22,449	0

Natural Gas Combustion from Cotton Dryers:

- The cotton gin included six 3.0 MMBtu/hr, one 1.5 MMBtu/hr, and one 1.0 MMBtu/hr burners. All burners were fired on PUC-quality natural gas.
- 1 MMBtu = 1 million cubic feet (MCF) x 1,000 MMBtu/1,000 MCF
- 1 Therm = 0.1 MMBtu

The applicant provided production and fuel usage records (see Attachment C) for the last five years (2021 – 2025) and the remaining five years (2016 - 2020) were obtained from the facility emissions inventory submittals. 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. Year 2025 was not a normal year for the facility as the cotton gin did not operate at all; therefore, the average will only include nine years' worth of data.

[1] https://www.cotton.org/journal/2012-16/2/upload/JCS16-105.pdf

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	Roller Gin Production (Bales)	Natural Gas Used (Therms)	Natural Gas Used (MCF)	Natural Gas Used (MMBtu)
2025	0	0	0	0
2024	22,449	90,331	n/a	9,033
2023	17,754	66,424	n/a	6,642
2022	22,075	80,831	n/a	8,083
2021	17,549	62,146	n/a	6,215
2020	53,773	n/a	18.05	18,050
2019	55,238	n/a	21.19	21,190
2018	50,021	n/a	17.57	17,570
2017	26,510	n/a	7.97	7,970
2016	28,529	n/a	9.04	9,040
Average	**32,655**	**n/a**	**n/a**	**11,533**

B. Emission Factors (EF)

Cotton Ginning Emissions

The PTO allowed the operation of a roller-type cotton gin and included emission limits for the ginning. The overall emission limit on the PTO for roller-type gin operation was 1.49 lb-PM_{10}/bale (see Attachment A, permit condition # 16).

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).

The cotton gin was last source tested (see Attachment F for source test results) in 2004 for the one 48" 1D-3D cyclone serving the unloading system, one 42" 1D-3D cyclone serving the pre-cleaner #1 system, one 40" 1D-3D cyclone serving the pre-cleaner #2 system, one 38" cyclone serving the gin-stand feeder trash system, and one 48" 1D-3D cyclone serving the mote trash system of the roller gin[2]. Although this cotton gin has undergone several modifications since this source test, these systems have not undergone any changes that would invalidate these source test results. As such, the source test data is still valid for these systems and shall be used. However, for equipment where there are no applicable facility-specific source test data, such as the other systems in the roller gin, the most accurate EF information is data from the California Cotton Ginners Association (CCGA) Handbook which is based on a compilation of EFs from source tests on Valley cotton gins.

[2] See Attachments E and F.

The EFs from the 2004 source test, CCGA Handbook, 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.

Roller Gin

Comparison of Source Tested Emission Factors, 2010 CCGA Handbook Emission Factors and the Permitted Emissions Factors Roller Gin					
System	Cyclone Design	Source Test Result (lb-PM_{10}/bale)	CCGA EFs (lb-PM_{10}/bale)	PTO EFs (lb-PM_{10}/bale)	EF Used for Calculations (lb-PM_{10}/bale)
Unloading	1D-3D	No Data	0.22	0.335	0.22
#1 Pre-cleaning	1D-3D	No Data	0.22	0.29	0.22
#2 Pre-cleaning	1D-3D	No Data	0.12	0.26	0.12
#3 Pre-cleaning	1D-3D	No Data	0.12	0.25	0.12
Overflow/Gin Stand	1D-3D	No Data	0.02	0.062	0.02
Feeder Trash	1D-3D	No Data	0.04		0.04
#1 Lint Cleaning	1D-3D	0.007[3]	0.02	0.014	0.007
#2 Lint Cleaning	1D-3D	0.02	0.04	0.04	0.02
Lint Trash/Robber	1D-3D	No Data	0.02	0.064	0.02
Lint Cleaner Trash	1D-3D	0.025	0.05	0.075	0.025
Battery Condenser	1D-3D	0.064[4]	0.07	0.1	0.064
Total		**n/a**	**0.94**	**1.49**	**0.88**

As shown above, the emissions factor for the roller gin operation is 0.88 lb-PM_{10}/bale, which is based on the comparison of CCGA Handbook, permit condition emission factors, and source test data. Pursuant to District practice, the lowest emission factor for each system, based on these three sources, was used to determine an overall emission factor for the roller gin.

<u>Natural Gas Combustion</u>:

The cotton gin included burners that provided heated air to control the moisture content of the cotton. These burners were fired on natural gas and ERCs are requested from their shutdown. The PTO contains natural gas combustion emission factors, so the EFs for natural gas combustion shall be referenced from the PTO.

[3] 1997 Source test data for *Lint A Cyclone System* indicates that < *10 µ results per system*: 0.007 lb-PM_{10}/bale.
[4] 1997 Source test data for *Battery Condenser Cyclone System* indicates that < *10 µ results per system*: 0.064 lb-PM_{10}/bale.

Burner Emission Factors		
Operation	Emission Rate	Source
Natural gas combustion in the heater	0.1 lb-NOx/MMBtu	Current PTO
	0.00285 lb-SOx/MMBtu	
	0.0076 lb-PM_{10}/MMBtu	
	0.02 lb-CO/MMBtu	
	0.0055 lb-VOC/MMBtu	

C. Baseline Period Determination and Data

Baseline Period Determination

In accordance with District Rule 2201, Section 3.9, 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 March 23, 2026, and the application to bank the ERCs from the shutdown of the operation was received on March 23, 2026. 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 2024 (December 28, 2024 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 November 2023 through the end of December 2024 will be used as the two 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 ten-year average will be used to determine the normal source operation (NSO). Cotton throughput and natural gas 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 production period that most closely represents normal source operation (NSO) will be determined using cotton production rates, as the facility's sole purpose was the production of cotton. Therefore, the baseline period will be solely based on the cotton bale production records, as determined in the following table.

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

Difference = [(Year 1 Rate + Year 2 Rate) ÷ 2] – (NSO)

An example calculation of the difference (absolute value) is shown below for the 2024 and 2025 period.

Difference = [(22,449 bales + 0 bales) ÷ 2] – 32,655 bales
= 11,225 bales – 32,655 bales
= -21,430 bales/year

The calculation is repeated in the following table for cotton production for each two-year period in the five year period from 2021 to 2025. Note that, as previously discussed in Section V.A, production records for the past 10 years are shown for the purpose of determining the normal source operation (NSO) as shown in the following table:

Production Data		
Season	Throughput (Bales/year)	Difference between two-year average and NSO (Bales/year)
2025	0	-21,430 [2025-2024]
2024	22,449	-12,554 [2024-2023]
2023	17,754	-12,741 [2023-2022]
2022	22,075	-12,843 [2022-2021]
2021	17,549	
2020	53,773	
2019	55,238	
2018	50,021	
2017	26,510	
2016	28,529	
10-year Average (NSO)	**32,655**	

For the five years immediately preceding the shutdown (2021 - 2025), the two-year period most closely matching the normal source operation (NSO) ten-year average (32,655 bales/yr) is 2023 - 2024. Therefore, the baseline period is 2023 - 2024.

- Based on the data shown in the table above and historical operating records (see Attachment C), the average annual throughput during the baseline period was 20,102 bales[5] and the average annual natural gas consumption was 7,838 MMBtu[6].
- Annual quantity of bales ginned was effectively limited by a permit condition to 93,598 bales/year, so the actual annual cotton bale production did not exceed the permitted amount[7] during the baseline period.
- Natural gas consumption was limited by the PM_{10} limit described in footnote 7. This was determined to be equivalent to an operation of 132.2 day/year (equivalent to the combustion of 65,279 MMBtu/year), so the calculated PM emissions associated with the combustion of natural gas do not exceed the permitted limit.

D. Historical Actual Emissions (HAE)

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 – Roller Gin

$HAE_{roller\ ginning,\ PM10}$ = EF, lb/bale × 20,102 bales/year

Historical Actual Emissions ($HAE_{roller\ ginning}$)			
Pollutant	EF (lb-PM_{10}/bale)	Throughput (bales/year)	HAE (lb/year)
PM_{10}	0.88	20,102	17,690

$HAE_{roller\ ginning,\ PM2.5}$ = PM_{10} HAE, lb-PM_{10}/year × $PM_{2.5}$ fraction, 16%

Historical Actual Emissions ($HAE_{roller\ ginning}$)			
Pollutant	PM_{10} HAE (lb-PM_{10}/year)	$PM_{2.5}$ fraction (%)	HAE (lb/year)
Portion of PM_{10} that is $PM_{2.5}$	17,690	0.16	2,830

[5] 20, 102 bales/year = (22,449 bales/year + 17,754 bales/year) / 2
[6] 7,838 MMBtu/year = (9,033 MMBtu/year + 6,642 MMBtu/year) / 2
[7] Permit condition #15 in PTO C-1385-1-10 limits annual PM_{10} emissions from the cotton gin to 139,960 lb/year. Adjusting this limit using the emission factor provided in condition #16 (1.49 lb-PM_{10}/bale) equates to an annual bale limit of 93,598 bale/year as calculated below: 139,960 lb-PM_{10}/year / [1,054.92 lb-PM_{10}/day (cotton gin operation) + 3.74 lb-PM_{10}/day (burners)] = 132.2 day/year of operation 708 bale/day x 132.2 day/year = 93,598 bale/year

Natural Gas Combustion HAE

$HAE_{Natural\ Gas}$ = EF, lb/MMBtu × 7,838 MMBtu/year

Historical Actual Emissions ($HAE_{Natural\ Gas}$)			
Pollutant	EF (lb/MMBtu)	Throughput (MMBtu/year)	HAE (lb/year)
NOx	0.1	7,838	784
SOx	0.00285	7,838	22
PM_{10}[8]	-	-	-
CO	0.02	7,838	157
VOC	0.0055	7,838	43

E. Adjustment to Historical Actual Emissions (HAE)

Emissions Adjusted for Rule 4201 – Particulate Matter Concentration

Rule 4201 (Particulate Matter Concentration) states a person shall not release or discharge into the atmosphere from any single source operation, dust, fumes, or total suspended particulate matter emissions in excess of 0.1 grain per cubic foot of gas at dry standard conditions. Pursuant to Section 3.26 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. The cotton gin has its particulate matter emissions limited to not exceed 0.1 grains/dscf in concentration. Therefore, no adjustments are needed for the cotton gin.

Emissions Adjusted for Rule 4202 – Particulate Matter – Emission Rate

Rule 4202 (Particulate Matter – Emission Rate) limits particulate matter emissions by establishing allowable emission rates, which was determined to be 24.5 lb-PM/hr (per project C-1192992). Pursuant to Section 3.26 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. The cotton gin has a PM emissions rate below 24.5 lb-PM/hr. Therefore, no adjustments are needed for the cotton gin.

[8] Emissions from the burners is vented to the cyclones. All PM emissions are included in the *cotton ginning HAE – roller gin* table above.

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 3.26 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 4301 – Fuel Burning Equipment

District Rule 4301 (Fuel Burning Equipment), Section 3.1 defines fuel burning equipment as any furnace, boiler, apparatus, stack, and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by indirect heat transfer. The burners at this facility produce heat by direct transfer of combustion gases; therefore, the burners in this operation are exempt from requirements of this rule and no adjustment is necessary.

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.

Emissions Adjusted for Rule 4801 – Sulfur Compounds

Rule 4801 (Sulfur Compounds) states a person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: two-tenths (0.2) percent by volume calculated as sulfur dioxide (SO2), on a dry basis average over 15 consecutive seconds. Pursuant to Section 3.26 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. The cotton gin has a sulfur emission rate of 1.97 ppmv (per project C-1192992) and the burners are allowed to use only limited to PUC-quality natural gas. Therefore, no adjustments are needed for the cotton gin.

Total Adjusted Historical Actual Emissions (HAE)

Additionally, facility files indicate that no Notice of Violations (NOVs) have been issued to the facility since its first inspection, which was conducted in November 1999. Therefore, all PTO requirements, which enforce applicable District Rules, were in compliance during the cotton gin's operation.

The total adjustment is equal to the sum of the adjusted parts. There were no adjustments made to the Historical Actual Emissions for NOx, SOx, PM_{10}, CO, or VOC. Therefore the HAE will be equal to the values calculated in Section V.C of this evaluation.

F. Post Project Potential to Emit (PE2)

As discussed above, the subject 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:

AQID = AER × 10%

AQID Calculations		
Pollutant	AER (lb/year)	AQID (lb/year)
NOx	784	78
SOx	22	2
PM_{10}	17,690	1,769
Portion of PM_{10} that is $PM_{2.5}$	2,830	283
CO	157	16
VOC	43	4

H. Emission Reductions Eligible for Banking

As shown previously in Section V.A of this evaluation, for the 2023 and 2024 operating seasons, the facility operated only in the 4th quarter of 2023 and 2024. Since there were no actual emissions in any other quarter, the AER will be credited to the 4th quarter only.

The bankable ERCs for criteria pollutants are presented in lb/quarter in the following table while the bankable ERCs for GHG are expressed in metric-tons/year.

Fourth Quarter (Criteria Pollutants)

Bankable ERCs 4th Quarter			
Pollutant	AER (lb/year)	AQID (lb/year)	Bankable AER* 4th Qtr (lb/quarter)
NOx	784	78	706
SOx	22	2	20
PM_{10}	17,690	1,769	15,921
Portion of PM_{10} that is $PM_{2.5}$	2,830	283	2,547
CO	157	16	141
VOC	43	4	39

* Bankable AER = AER – AQID.

VI. Compliance

To comply with the definition of Actual Emissions Reductions (AER) (Rule 2201, Section 3.2), the emissions reduction must be:

A. Real

The emissions reductions were generated by the shutdown of a cotton gin. The emissions were calculated from historic actual production data, average cotton bale and natural gas throughput rates as well as generally recognized emission factors. The associated equipment has been removed from service and the permit has been surrendered to the District.

As part of the District's assessment of whether the emission reductions from a banking action relying on a shutdown or curtailment qualify as *real*, the District also evaluates whether or not the business activity and the emissions associated with the activity have a reasonable probability of being shifted to another facility (source shifting). It is expected that there will be no source shifting, based on the following discussion.

Reduction in Available Water for Cotton Farming in the Area

Twenty years ago, Fresno County used to be the #1 cotton-producing county in the entire Unites States of America. Today, only a small fraction of the cotton farming acreage remains. A primary contributor to this decline is the lack of water.

Biological Opinions

The shutdown cotton gin processed cotton grown in its surrounding area in western Fresno County within the Westlands Water District (Westlands). Westlands farms have two primary water sources, groundwater pumping and the federal Central Valley Project (CVP) via the U.S. Bureau of Reclamation. However, two biological opinions protecting delta smelt and salmon went into effect requiring limits on the amount of water transported

in the CVP. These opinions are part of the long-term governance on how the state water project and the CVP operate, which have been upheld by courts and remain in place today.

The reduction in water exports have significantly contributed to the state of farming in the Westlands area due to the significant reduction in surface water deliveries. These biological opinions effectively took 500,000 acre-feet of surface water away from western Fresno County. Consequently, with the reduction in surface water supply, cotton acreage declined significantly with many farms converting to fallow (uncultivated) land in the area, causing 20 of the 26 gins operating in 2005 to shutdown by 2009. This left groundwater pumping as the only remaining major source of water for the cotton crops.

Subsidence

Subsidence is the gradual sinking of the Earth's surface. In many agricultural regions, including the Westlands, the most common driver of subsidence is excessive groundwater pumping. When enough subsurface water is removed, the sediment compacts and the land above it settles downward. When there is not enough surface water (e.g., due to drought and/or regulatory decisions), farmers pump more groundwater to irrigate crops. This lowers subsurface water levels and can cause subsidence, which is attributed to a loss of 35,000 acres of cotton in the Westlands. Subsidence also causes drainage issues, further resulting in the permanent loss of farming acreage. Once subsidence occurs and aquifers are compacted, they lose water storage capacity permanently.

Sustainable Groundwater Management Act (SGMA)

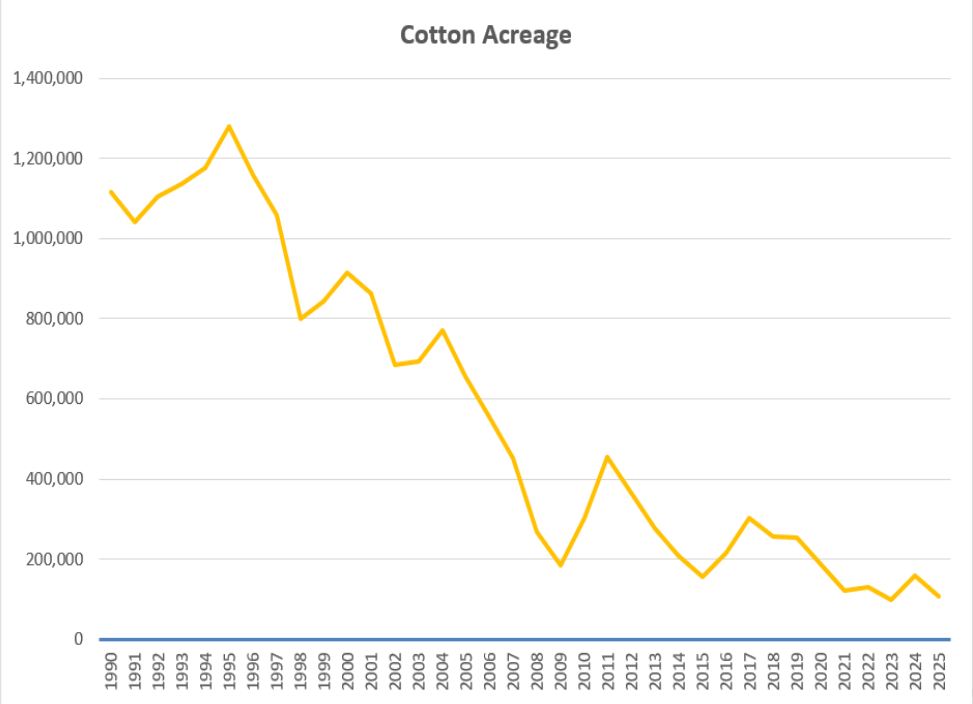
Subsequently, groundwater pumping/usage within the state of California has become heavily regulated. With the historic passage of the Sustainable Groundwater Management Act (SGMA) in 2014, which set forth a statewide framework to help protect groundwater resources over the long-term; restrictions on the pumping of groundwater resources were placed throughout the state. It is estimated that SGMA restrictions may take out as much as 900,000 to one million acres of existing farmland in the valley. Cotton growers in the Westlands area continue to fallow cotton acreage due to lack of water and SGMA restrictions.

Due to these water-related issues, farms in the area of the shutdown gin have gone fallow. The previous cotton production that supplied the shutdown gin will not be shifted to another gin since it will no longer be grown.

Decline of Cotton Industry

In addition to the Westlands area, cotton acreage in the Valley and California as a whole has been on the decline for several decades. Cotton acreage in California in 2025 was the second lowest on record, and it was the lowest ever in Fresno County resulting in the shutdown of this gin. According to the 35-year period data provided by the California Cotton Ginners and Growers Association (CCGGA), cotton production has dropped significantly over this time period, with an estimate decrease of 90% in California. The table and graph below show the California cotton acreage decrease from 1990 to 2025:

Historical Cotton Acreage in California (1990-2025)	
Year	Total (acres)
1990	1,115,500
1991	1,041,000
1992	1,105,000
1993	1,136,000
1994	1,175,800
1995	1,280,000
1996	1,159,000
1997	1,059,000
1998	800,000
1999	844,000
2000	914,000
2001	864,000
2002	686,000
2003	694,000
2004	771,000
2005	657,000
2006	557,000
2007	451,000
2008	268,000
2009	186,000
2010	303,000
2011	454,000
2012	365,000
2013	278,000
2014	207,975
2015	157,652
2016	216,000
2017	302,000
2018	257,000
2019	254,000
2020	187,027
2021	121,127
2022	131,801
2023	99,579
2024	158,709
2025	106,980



Additional data provided from the USDA National Ag Statistics Service shows the significant decline in cotton acreage in Fresno County specifically from 141,000 acres in 2011 to just 21,613 acres in 2025. The table below shows the Fresno County cotton acreage:

Fresno County Cotton Acreage			
Year	Upland	Pima	Total
2011	35,000	106,000	141,000
2012	19,500	83,000	102,500
2013	13,600	48,700	62,300
2014	7,320	40,400	47,720
2015	6,840	33,250	40,090
2016	8,480	39,800	48,280
2017	5,210	69,845	75,055
2018	3,350	65,740	69,090
2019	2,420	77,200	79,620
2020	2,400	32,200	34,600
2021	1,370	23,200	24,570
2022	1,950	31,000	32,950
2023	727	30,038	30,765
2024	25	40,303	40,328
2025	1,621	19,992	21,613

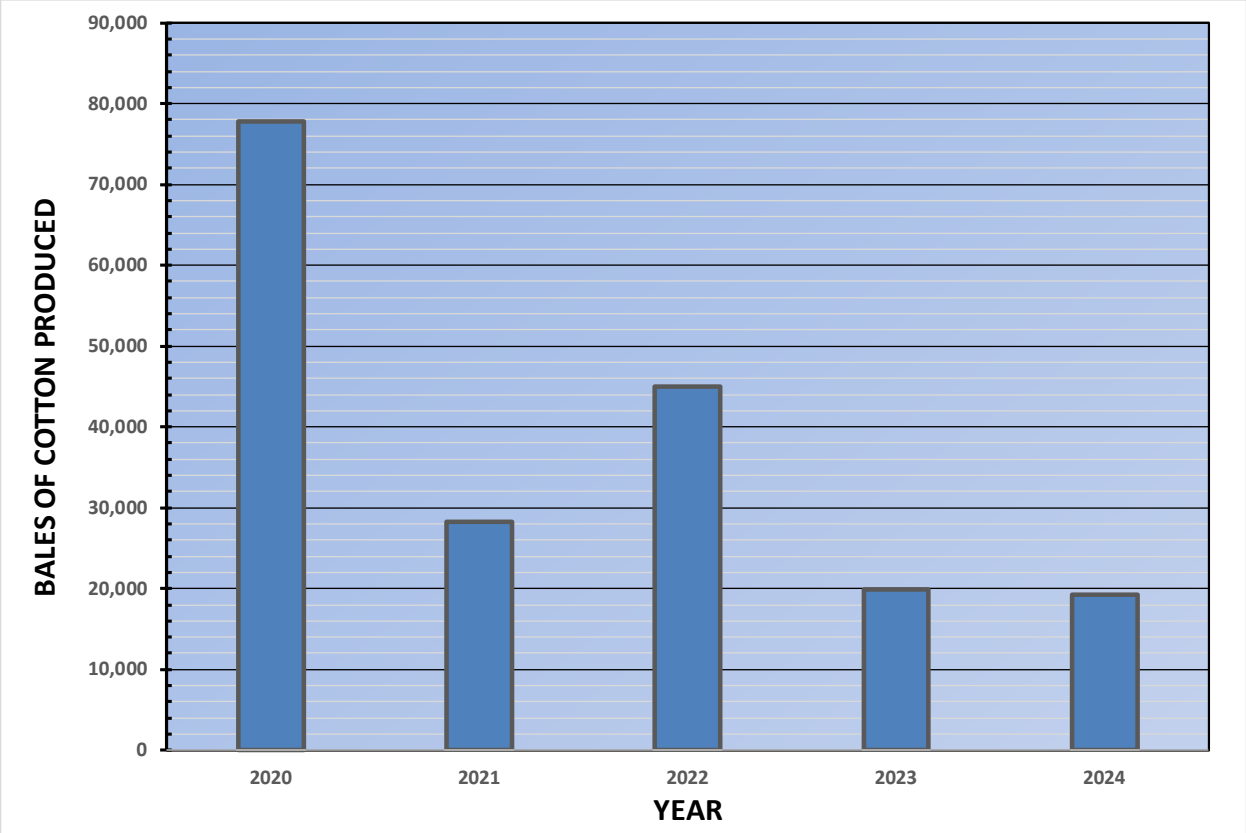
As shown in the tables above both Fresno County and California as a whole have seen a significant decline in cotton acreage being planted. This trend suggests that future cotton acreage will continue to decline which will further constrain cotton gin operations within the District.

Based on the discussion above, the existing cotton acreage and associated cotton production for the gin will no longer exist. In addition, the cotton industry's production continues to decline in the Valley. For these reasons, no source shifting is expected, and the few remaining gins in the Valley are not expected to see an increase in cotton processing as a result of this shutdown. Therefore, the emission reductions from this banking action are real.

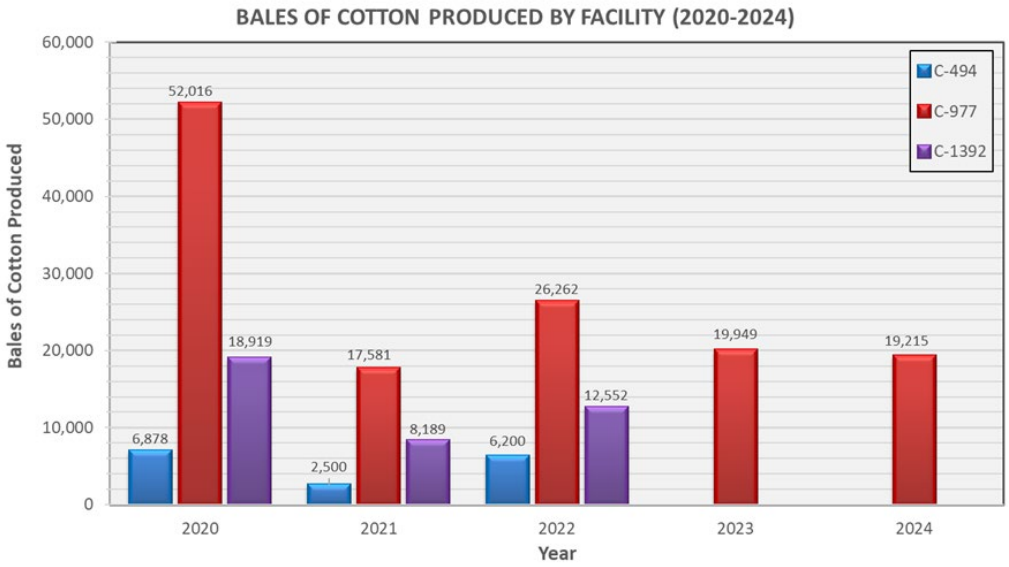
Trend of Cotton Production in Fresno County

Similar to the State's cotton production trend, cotton production in Fresno County has also been on the decline these past few years, with the amount of cotton produced in Fresno County in 2024 being the lowest on record, and it was the fourth lowest ever for FID C-1385 resulting in the shutdown of this gin. According to Emissions Inventory, data provided by our Technical Services Department, shown in the following table and graph below, the number of cotton bales produced in Fresno County (excluding C-1385) has decreased by 75% from 2020 to 2024:

Year	C-15	C-494	C-647	C-977	C-1364	C-1383	C-1392	Total
2020	0	6,878	0	52,016	0	0	18,919	77,813
2021	0	2,500	0	17,581	0	0	8,189	28,270
2022	0	6,200	0	26,262	0	0	12,552	45,014
2023	0	0	0	19,949	0	0	0	19,929
2024	0	0	0	19,215	0	0	0	19,215



Furthermore, each individual facility (FID) that operated in Fresno County generally shows a decline in the amount of bales of cotton produced from 2020 to 2024. Each facility operating in Fresno County, recorded 2021 as the lowest amount of cotton produced, and that was lowest on record as well for FID C-1385.



Lastly, production records provided by C-1385 show the significant decline in the number of bales of cotton produced, from 55,238 bales of cotton in 2019 to just 22,449 bales of cotton in 2024. The following table shows the cotton production for C-1385 over the past 10 years:

C-1385	
Year	Roller Gin Production (Bales)
2025	0
2024	22,449
2023	17,754
2022	22,075
2021	17,549
2020	53,773
2019	55,238
2018	50,021
2017	26,510
2016	28,529

As shown in the tables and charts above, both District permitted cotton gins in Fresno County and FID C-1385 as a whole have seen a significant decline in the number of bales of cotton produced. This trend suggests that the amount of cotton produced will continue to decline, which will further constrain cotton gin operations within the District and Fresno County, which is due to the irrigation issues and decrease in cotton acreage decline discussed earlier in this evaluation.

For these reasons, the District does not expect cotton production to be shifted to other cotton gins due to the shutdown of C-1385. Therefore, the emission reductions from this banking action are real.

B. Enforceable

The PTO for this facility has been surrendered and the cotton gin cannot be operated without a valid PTO. Due to the size and complexity of the operation, the large bulk of the material processed, and the amount of lint, seeds, and waste material generated, it would be readily apparent if it were to be operated in the future. Therefore, the emission reductions satisfy the enforceable requirement.

C. Quantifiable

Actual Emission Reductions (AER) amounts were calculated from historic process throughput data, source test results from this operation, 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.

D. Permanent

The cotton gin has been removed from service and the PTO has been surrendered. Operation of the equipment without a valid PTO is subject to enforcement action. Construction of equipment that would replace the equipment removed at this facility, regardless if constructed at the same or different location, must be authorized by the District after evaluation under all applicable rules, including District Rule 2201 (New and Modified Stationary Source Review Rule), under which any increase in emissions over the applicable threshold(s) must be offset.

Therefore, the emission reductions are permanent within the boundaries of the District.

E. 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 any laws, rules, regulations, agreements, orders, or permits.
- According to the attached records, the gin did not exceed the permitted baling and natural gas consumption rates, so no adjustments are necessary on that basis.
- The emission reductions are not the result of an action taken by the permittee to comply with any requirement of District Rules 4201, 4202, 4204, 4301, and 4801.

Therefore, the emission reductions satisfy the surplus requirement.

F. Not used for the approval of an Authority to Construct or as Offsets

The ERCs generated by permanent shutdown of the cotton gin were not used in the approval of an Authority to Construct or as offsets for any projects at the facility.

G. Timely Submittal

Pursuant to District Rule 2301, Section 4.2.3, in order to deem emissions reductions eligible for banking, an application for ERC must be filed no later than 180 days after the *AER* occurred. Rule 2301, Section 5.5 addresses when the start date of the 180 day clock begins. For *AER* resulting from the cessation of operation of an emissions unit with a Permit to Operate, the date of emission reduction is the date of *shutdown (Section 5.5)*. For permitted sources, the date of *shutdown* is (generally) the date of surrender of the Permit to Operate (Section 3.14.2).

Anderson Clayton Corp/Silver Creek #1 submitted its ERC application on March 23, 2026, together with a request to cancel the Permit to Operate (PTO). Although the last emissions from this cotton gin operation occurred in December 2024, this date does not represent the shutdown date as described above, because at that time, the facility was actively marketed for sale with the explicit expectation that a new owner would continue cotton gin operations.

Consistent with that intent, Anderson Clayton Corp/Silver Creek #1 maintained the equipment in an operable condition to preserve its viability for continued used. These actions demonstrate a clear and ongoing intent to resume operations, or to enable their immediate resumption by a successor, and therefore, do not support a finding that the unit had been permanently shutdown as of the last emissions date.

The cotton gin operation was sold on June 19, 2026. It was not until March 2026, that Anderson Clayton Corp/Silver Creek #1 became aware that the purchaser would not continue cotton gin operations at the site. Only at that point was the intent to operate the emissions unit definitively extinguished. Prior to this, the facility was maintained in an operable condition and was marketed for sale, with the full intention for continued operation, consistent with the rule's criteria for demonstrating intent to operate. Accordingly, June 19, 2026, the date of sale and transfer to an owner with no intent to operate the emissions units, represents the first point at which both Sections 3.14.2.1 and 3.14.1.2 of the rule are satisfied. Therefore, the District has determined that the shutdown date is June 19, 2026.

Additionally, facility files indicate that no offsets were ever provided by this stationary source for an increase in permitted emissions/permit units pursuant to District Rule 2201 and the ERC banking is for the shutdown of a cotton gin operation. Therefore, Sections 4.3 and 4,4 are not applicable and the emission reductions are eligible per District Rule 2301.

VII. Recommendation

Pending a successful Public Noticing period, issue Emission Reduction Credit (ERC) certificate to Anderson Clayton Corp/Silver Creek #1 in accordance with the amounts specified on the draft ERC certificates in Attachment D.

Attachments:

Attachment A: Surrendered PTO C-1385-1-10
Attachment B: ERC Application
Attachment C: Cotton Ginning Throughput and Natural Gas Usage Records
Attachment D: Draft ERC Certificates
Attachment E: 1997 Source Test Results
Attachment F: 2004 Source Test Results

ATTACHMENT A
Surrendered PTO C-1385-1-10

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-1385-1-10 **EXPIRATION DATE:** 10/31/2027

EQUIPMENT DESCRIPTION:
COTTON GIN (SILVER CREEK #1) WITH WAGON SUCTION, MODULE FEEDER, TWENTY LUMMUS ROLLER GINS, SIX HOT AIR CLEANERS (1ST, 2ND, 3RD STAGE) WITH SIX 3.0 MMBTU/HR NATURAL GAS-FIRED BURNERS, ONE 1.5 MMBTU/HR NATURAL GAS-FIRED BATTERY CONDENSER HUMIDIFIER BURNER, ONE 1.0 MMBTU/HR NATURAL GAS-FIRED LINT SLIDE BURNER, OVERFLOW, SUPER JET LINT CLEANERS, CONDENSERS (1ST, 2ND STAGE), BATTERY CONDENSER, AND A TRASH SYSTEM

PERMIT UNIT REQUIREMENTS

1. 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]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. Material removed from cyclone(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
6. No. 1 hot air drying & precleaning systems shall be controlled by four 44" 1D-3D cyclone collectors with expansion chambers, all operating at a cyclone inlet air velocity of 3200 ± 400 ft/min. [District Rules 2201 and 4204]
7. No. 2 hot air drying & precleaning systems, and feeder trash systems, shall be controlled by four 44" 1D-3D cyclone collectors, all operating at a cyclone inlet air velocity of 3200 ± 400 ft/min. [District Rules 2201 and 4204]
8. The #3 precleaning system of the roller ginning operation shall be controlled by two 38" enhanced 1D-3D cyclones with expansion chambers and two 38" 1D-3D cyclones with expansion chambers, all operating at a cyclone inlet air velocity of 3200 ± 400 ft/min. [District Rules 2201 and 4204]
9. Gin feeder dust and overflow systems shall be controlled by four 44" 1D-3D cyclone collectors, all operating at a cyclone inlet air velocity of 3200 ± 400 ft/min. [District Rules 2201 and 4204]
10. Lint cleaning systems shall be controlled by four 54" and four 60" 1D-3D cyclone collectors, all operating at a cyclone inlet air velocity of 3200 ± 400 ft/min. [District Rules 2201 and 4204]
11. Lint trash shall be controlled by one 44" and two 48" 1D-3D cyclone collectors, all operating at a cyclone inlet air velocity of 3200 ± 400 ft/min. [District Rules 2201 and 4204]
12. Battery condensers shall be controlled by three 66" 1D-3D cyclone collectors, all operating at at a cyclone inlet air velocity of 3200 ± 400 ft/min. [District Rules 2201 and 4204]
13. Robber system (battery condenser trash) shall be controlled by two 48" 1D-3D cyclone collectors, all operating at a cyclone inlet air velocity of 3200 ± 400 ft/min. [District Rules 2201 and 4204]
14. The trash loading area shall be enclosed with four sides that are higher than the trash auger. Two sides shall be solid. The remaining sides shall have flexible wind barriers that extend below the top of the trash trailer sides. [District Rule 4204]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

15. PM10 emissions shall not exceed 139,960 pounds in any rolling 12-month period. [District Rule 2201]
16. Total PM10 emissions from the roller cotton gin operation shall not exceed 5.97 pound per ton of baled cotton (1.49 pound per bale, corrected to 500 pound bales). [District Rule 2201]
17. Daily ginning rate of the roller gin stand shall not exceed 176.2 tons of baled cotton per day (708 bales per day, based on 500 pound bales). [District Rule 2201]
18. All burners serving the cotton gin shall only be fired on PUC-quality natural gas. [District Rules 2201 and 4801]
19. Emissions from the PUC-quality natural gas fired burners shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.02 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201]
20. PM10 emissions from the cyclone system serving the unloading system for the roller gin shall not exceed 0.335 pound per bale, corrected to 500 pound bales. [District Rule 2201]
21. PM10 emissions from the cyclone system serving the #1 precleaning system for the roller gin shall not exceed 0.29 pound per bale, corrected to 500 pound bales. [District Rule 2201]
22. PM10 emissions from the cyclone system serving the #2 precleaning system for the roller gin shall not exceed 0.26 pound per bale, corrected to 500 pound bales. [District Rule 2201]
23. PM10 emissions from the cyclone system serving the #3 precleaning system for the roller gin shall not exceed 0.25 pound per bale, corrected to 500 pound bales. [District Rule 2201]
24. PM10 emissions from the cyclone system serving the #1 lint cleaning system for the roller gin shall not exceed 0.014 pound per bale, corrected to 500 pound bales. [District Rule 2201]
25. PM10 emissions from the cyclone system serving the #2 lint cleaning system for the roller gin shall not exceed 0.04 pound per bale, corrected to 500 pound bales. [District Rule 2201]
26. PM10 emissions from the cyclone system serving the lint cleaning trash system for the roller gin shall not exceed 0.075 pound per bale, corrected to 500 pound bales. [District Rule 2201]
27. PM10 emissions from the cyclone system serving the gin feeder dust & overflow system A for the roller gin shall not exceed 0.062 pound per bale, corrected to 500 pound bales. [District Rule 2201]
28. PM10 emissions from the cyclone system serving the battery condenser system A for the roller gin shall not exceed 0.1 pound per bale, corrected to 500 pound bales. [District Rule 2201]
29. PM10 emissions from the cyclone system serving the robber system (battery condenser trash) for the roller gin shall not exceed 0.064 pound per bale, corrected to 500 pound bales. [District Rule 2201]
30. Unloading systems shall be controlled by four enhanced 48" 1D-3D cyclone collectors with expansion chambers, at a cyclone inlet air velocity of 3200 ± 400 ft/min. [District Rules 2201 and 4204]
31. Permittee shall conduct daily visual inspections of the material handling systems for leaks, breaks, or other visible signs of equipment malfunctions. [District Rule 4204]
32. Daily records of the number of 500-lb bales produced from this gin shall be maintained. [District Rules 1070 and 2201]
33. Weekly records of the number of 500-lb bales produced shall be maintained on a calendar year basis and made available for District inspection upon request. [District Rules 1070 and 2201]
34. Permittee shall keep a record of the annual PM10 emissions. PM10 emissions are calculated as follows: PM10 = Bales Produced x the applicable PM10 emissions rate for the gin (lb-PM10/500 lb/bale). [District Rule 2201]
35. Permittee shall maintain a record of the daily inspections, including any equipment malfunctions discovered and corrective action taken to repair the malfunction, and any source test results. [District Rule 4204]
36. On a monthly basis, the permittee shall calculate and record the monthly PM10 emissions from this unit. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

37. On a monthly basis, the permittee shall calculate and record the PM10 emissions in pounds for the rolling 12-month period. The PM10 emissions shall be calculated by summing the PM10 emissions from the previous 12 months. [District Rule 2201]

38. All records shall be retained on site for five years and made available to the District upon request. [District Rules 2201 and 4204]

ATTACHMENT B
ERC Application

San Joaquin Valley Air Pollution Control District

Application for

[X] EMISSION REDUCTION CREDIT (ERC) [ ] CONSOLIDATION OF ERC CERTIFICATES

1. ERC TO BE ISSUED TO: Olam Agri Americas, Inc. fka Olam Cotton — Facility ID: C-1385 (if known)

2. MAILING ADDRESS: Street/P.O. Box: 2221 Lakeside Blvd

City: Richardson State: TX Zip Code: 75082

3. LOCATION OF REDUCTION:
Street: 43939 North Ave
City: Firebaugh
/4 SECTION TOWNSHIP RANGE

4. DATE OF REDUCTION: 1/1/26

5. PERMIT NO(S): C-1385-1-9 EXISTING ERC NO(S):

6. METHOD RESULTING IN EMISSION REDUCTION:

[X] SHUTDOWN [ ] RETROFIT [ ] PROCESS CHANGE [ ] OTHER

DESCRIPTION:

Not enough cotton is bbeing grown in Fresno County to warrant running this gin, so it is permanently shutting down and forfeiting its permit to operate

(Use additional sheets if necessary)

7. REQUESTED ERCs: (In pounds per calendar quarter except CO_2e)

	VOC	NOx	CO	PM_{10}	SOx	Other
1st Qtr						
2nd Qtr						
3rd Qtr						
4th Qtr	42.3	705.4	141.1	19,357.3	21.2	

CO_2e 432 metric ton/yr

8. SIGNATURE OF APPLICANT:

TYPE OR PRINT TITLE OF APPLICANT: Financial Controller

9. TYPE OR PRINT NAME OF APPLICANT: Olam Agri Americas, Inc. fka Olam Cotton

DATE: March 19, 2026

PHONE #: (469) 607-5323
CELL PHONE #: (214) 957-6966
FAX #:(214) 965-0082
E-MAIL: phil.barrett@olamagri.com

FOR APCD USE ONLY:

DATE STAMP: Received MAR 23 2026 SJVAPCD

FILING FEE RECEIVED: $ 94

DATE PAID: 3/23/26

PROJECT NO.: C1261347 FACILITY ID.: C1385

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: Olam Agri Americas, Inc. fka Olam Cotton
Gin Location: 43939 North Avenue, Firebaugh, CA

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-1385-1-9

3. What date did the emission reductions occur? (if #1 above applies, when was the gin first operated after control equipment was installed? If #2 applies, when was the gin last operated, or when was the Permit to Operate surrendered?)

   MM/DD/YY: 12 /28 /24

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	2025	2024	2023	2022	2021
Start MM/DD/YY	n/a	10/15/24	11/2/23	10/20/22	10/20/21
End MM/DD/YY	n/a	12/28/24	12/20/23	12/13/22	12/8/21
No. of Bales*	0	22,449	17,754	22,075	17,549

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

(Please continue on other side)

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

System	Pre-mod or Pre-shutdown EF	Post-mod EF*	References
Unloading #1/ #2	/	/	
Pre-Cleaner #1/ #2/ #3	/ /	/ /	
Overflow			
Lint Cleaner #1/ #2/ #3	/ /	/ /	
Battery Condenser			
Trash			
Motes			
Motes Trash			
Other			
Other			
Totals		1.49	permit

* This column is for the addition of control equipment only - do not use if the emission reductions are the result of a shut-down.

Proposal for Emission Reduction Credits (ERCs) for the Shutdown of Olam Cotton's Silver Creek #1 Gin located at 43939 North Ave., Firebaugh, CA 93622

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

PRODUCTION DATA		
Year	**Bales Ginned**	**Therms of Natural Gas Consumed**
2025	0	0
2024	22,449	90,331
2023	17,754	66,424
2022	22,075	80,831
2021	17,549	62,146

Baseline Period –

Two consecutive years = 2024 and 2023

Bales = (22,449 + 17,754)/2
Bales = 20,101.5

Therms of Natural Gas consumed = (90,331 + 66,424)/2
Therms natural gas consumed = 78,377.5

Historical Actual Emissions (HAE) -

Cotton Gin Emission Factor -

As listed in permit condition No. 6 (PTO#: C-1385-1-9), emissions from this gin are equal to 1.49 lbs. PM10/bale.

Cotton Gin Emissions -
HAE = Emission Factor (lb PM10/Bale) x Baseline Period Production History (bales/yr)
HAE = 1.49 lb PM10/bale x 20,101.5 bales/yr
HAE = 29,951.2 lb PM10/yr

Natural Gas Combustion Emission Factors –

Natural Gas Emission Factors	
Pollutant	**Emission Factor (lb/MMBtu)**
NOx	0.1
SOx	0.003
CO	0.02
VOC	0.006
CO2e	0.063 (tons/gal)

Natural Gas Combustion Emissions -

HAE = Emission Factor (lb/MMBTU) x 0.1 MMBtu/therm x therms burned

Natural Gas Emission Calculations (HAE)			
Pollutant	**Emission Factor (lb/MMBtu)**	**Natural Gas Usage (therms)**	**Emissions (lb/yr)**
NOx	0.1	78,377.5	**783.8**
SOx	0.003	78,377.5	**23.5**
CO	0.02	78,377.5	**156.8**
VOC	0.006	78,377.5	**47.0**
CO2e	12	78,377.5	**940,530**

Actual Emission Reductions (AER) -

For shutdowns, AER = HAE

Actual Emission Reduction Calculations	
Pollutant	**AER (lb/yr)**
PM10	**29,951.2**
NOx	**783.8**
SOx	**23.5**
CO	**156.8**
VOC	**47**
CO2e	**940,530**

Air Quality Improvement Deduction (AQID) -

AQID = 10% AER

Air Quality Improvement Deduction Calculations		
Pollutant	**AER (lb/yr)**	**AQID (lb/yr)**
PM10	**29,951.2**	**2,995.1**
NOx	**783.8**	**78.4**
SOx	**23.5**	**2.4**
CO	**156.8**	**15.7**
VOC	**47**	**4.7**
CO2e	**940,530**	**94,053**

Emission Reduction Credits (ERCs) -

Emission Reduction Credits (ERCs) = AER - AQID

Emission Reduction Credit Calculations			
Pollutant	**AER (lb/yr)**	**AQID (lb/yr)**	**ERCs (lb/yr)**
PM10	**29,951.1**	**2,995.1**	**26,956.1**
NOx	**783.8**	**78.4**	**705.4**
SOx	**23.5**	**2.4**	**21.2**
CO	**156.8**	**15.7**	**141.1**
VOC	**47.0**	**4.7**	**42.3**
CO2e	**940,530**	**94,053**	**846,477**

Olam Cotton's Silver Creek #1 Gin
Historical Cotton Production and Natural Gas Conumption

YEAR	BALES (500#)	Natural Gas (therms0	START DATE	END DATE
2025	0	0	N/A	N/A
2024	22,449	90,331	10/15/24	12/28/24
2023	17,754	66,424	11/2/23	12/20/23
2022	22,075	80,831	10/20/22	12/13/22
2021	17,549	62,146	10/20/21	12/8/21

ATTACHMENT C
Cotton Ginning Throughput and Natural Gas Usage Records

Date / Time Printed 08/07/2017 11:46:40 AM

UTM Zone : 10
UTM East: 715.754
UTM North: 4063.11

Emission Statement - Calendar Year 2016 Emissions

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

Facility ID # C - 1385
TAD # 10 - 1385
SIC # 724 NAICS 115111
Facility Name ANDERSON CLAYTON CORP/SILVER
TOXID #
Planning Inventory: / Electronic

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL : Y

Device ID #	Process #	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	Note: NH3 emissions are in lbs / yr
1	1	Cotton Gin - Silver Creek #1 - Bales of Cotton	28529	BALES OF COTTON	.0	.0	.0	.0	1.49	.0	
				30200410	**.0**	**.0**	**.0**	**.0**	**21.25**	**.0**	**(Tons/Yr)**
1	2	Total 19.5 MMBtu/Hr Burners - Nat Gas	9.04	MILLION CUBIC FEET BURNED	100.0	6.0	3.0	20.0	.0	.0	
				30290003	**.45**	**.03**	**.01**	**.09**	**.0**	**.0**	**(Tons/Yr)**

Last Updated By BOTILLB

Emission Statement - Calendar Year 2017 Emissions

Date / Time Printed 07/03/2018 / 4:21:07 PM

UTM Zone: 10
UTM East: 715.754
UTM North: 4063.11

Please Sign and Return to:
San Joaquin Valley APCD
1990 E. Gettysburg Ave.
Fresno, CA 93726

Facility ID # C - 1385
TAD # 10 - 1385
SIC # 724
Facility Name ANDERSON CLAYTON CORP/SILVER
TOXID #
Planning Inventory / Electronic

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL : Y

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	Note: NH3 emissions are in lbs / yr
1	1	COTTON GIN - SILVER CREEK #1 - BALES OF COTTON	26510	BALES OF COTTON	.0	.0	.0	.0	1.49	.0	
				30200410	.0	.0	.0	.0	19.75	.0	(Tons/Yr)
1	2	TOTAL 19.5 MMBTU/HR BURNERS - NAT GAS	7.97	MILLION CUBIC FEET BURNED	100.0	6.0	3.0	20.0	.0	.0	
				30290003	.4	.02	.01	.08	.0	.0	(Tons/Yr)
				Totals For the Facility (Tons / Year)	0.4	0.02	0.01	0.08	19.75	0.0	

Contact	Greg Gillard
Company	ANDERSON CLAYTON CORP/SILVER
Address	205 E RIVER PARK CIR STE 310
City,State,Zip	FRESNO, CA 93720-1572
Telephone	(559) 446 - 6463
Email:	gregg@andersonclayton.com
Location of facility if different from above	ANDERSON CLAYTON CORP/SILVER 43939 NORTH AVE FIREBAUGH, CA 93622

Name and Title of Responsible Official

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

Signature of Responsible Official and Date

Note: This data was taken from last year's emissions inventory data. Please update this sheet with this year's data.

Date / Time Printed 4/4/2019 11:51:49 AM

UTM Zone : 10
UTM East: 715.754
UTM North: 4063.11

Emission Statement - Calendar Year 2018 Emissions

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

Facility ID # C - 1385
TAD # 10 - 1385
SIC # 724 NAICS 115111
Facility Name ANDERSON CLAYTON CORP/SILVER
TOXID #
Planning Inventory: / Electronic

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL : Y

Device ID #	Process #	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	Note: NH3 emissions are in lbs / yr
1	1	Cotton Gin - Silver Creek #1 - Bales of Cotton	50021	BALES OF COTTON	.0	.0	.0	.0	1.49	.0	
				30200410	**.0**	**.0**	**.0**	**.0**	**37.27**	**.0**	**(Tons/Yr)**
1	2	Total 19.5 MMBtu/Hr Burners - Nat Gas	17.57	MILLION CUBIC FEET BURNED	100.0	6.0	3.0	20.0	.0	.0	
				30290003	**.88**	**.05**	**.03**	**.18**	**.0**	**.0**	**(Tons/Yr)**

Last Updated By BOTILLB

Date / Time Printed 5/5/2020 9:46:53 AM

UTM Zone : 10
UTM East: 715.754
UTM North: 4063

Emission Statement - Calendar Year 2019 Emissions

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

Facility ID # C - 1385
TAD # 10 - 1385
SIC # 724 NAICS 115111
Facility Name ANDERSON CLAYTON CORP/SILVER
TOXID #
Planning Inventory: / Electronic

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

Device ID #	Process #	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	Note: NH3 emissions are in lbs / yr
1	1	Cotton Gin - Silver Creek #1 - Bales of Cotton	55238	BALES OF COTTON	.0	.0	.0	.0	1.49	.0	
				30200410	**.0**	**.0**	**.0**	**.0**	**41.15**	**.0**	**(Tons/Yr)**
1	2	Total 19.5 MMBtu/Hr Burners - Nat Gas	21.19	MILLION CUBIC FEET BURNED	100.0	6.0	3.0	20.0	.0	.0	
				30290003	**1.06**	**.06**	**.03**	**.21**	**.0**	**.0**	**(Tons/Yr)**
7001	1	250 GAL TANK - RED DIESEL	2.8	1000 GALS PUMPED	.0	.03	.0	.0	.0	.0	
				40600651	**.0**	**.0**	**.0**	**.0**	**.0**	**.0**	**(Tons/Yr)**
7002	1	200 GAL TANK - CLEAR DIESEL	0.15	1000 GALS PUMPED	.0	.03	.0	.0	.0	.0	
				40600651	**.0**	**.0**	**.0**	**.0**	**.0**	**.0**	**(Tons/Yr)**

Last Updated By LAWLERC

Date / Time Printed 03/15/2021 11:37:54 AM

UTM Zone : 10
UTM East: 715.754
UTM North: 4063

Emission Statement - Calendar Year 2020 Emissions

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

Facility ID # C - 1385
TAD # 10 - 1385
SIC # 724 NAICS 115111
Facility Name ANDERSON CLAYTON CORP/SILVER
TOXID #
Planning Inventory: / Electronic

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL : N

Device ID #	Process #	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	Note: NH3 emissions are in lbs / yr
1	1	Cotton Gin - Silver Creek #1 - Bales of Cotton	53773	BALES OF COTTON	.0	.0	.0	.0	1.49	.0	
				30200410	**.0**	**.0**	**.0**	**.0**	**40.06**	**.0**	**(Tons/Yr)**
1	2	Total 19.5 MMBtu/Hr Burners - Nat Gas	18.05	MILLION CUBIC FEET BURNED	100.0	6.0	3.0	20.0	.0	.0	
				30290003	**.9**	**.05**	**.03**	**.18**	**.0**	**.0**	**(Tons/Yr)**
7001	1	250 GAL TANK - RED DIESEL	2.8	1000 GALS PUMPED	.0	.03	.0	.0	.0	.0	
				40600651	**.0**	**.0**	**.0**	**.0**	**.0**	**.0**	**(Tons/Yr)**
7002	1	200 GAL TANK - CLEAR DIESEL	0.15	1000 GALS PUMPED	.0	.03	.0	.0	.0	.0	
				40600651	**.0**	**.0**	**.0**	**.0**	**.0**	**.0**	**(Tons/Yr)**

Last Updated By VUY

Proposal for Emission Reduction Credits (ERCs) for the Shutdown of Olam Cotton's Silver Creek #1 Gin located at 43939 North Ave., Firebaugh, CA 93622

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

PRODUCTION DATA		
Year	**Bales Ginned**	**Therms of Natural Gas Consumed**
2025	0	0
2024	22,449	90,331
2023	17,754	66,424
2022	22,075	80,831
2021	17,549	62,146

Baseline Period –

Two consecutive years = 2024 and 2023

Bales = (22,449 + 17,754)/2
Bales = 20,101.5

Therms of Natural Gas consumed = (90,331 + 66,424)/2
Therms natural gas consumed = 78,377.5

Historical Actual Emissions (HAE) -

Cotton Gin Emission Factor -

As listed in permit condition No. 6 (PTO#: C-1385-1-9), emissions from this gin are equal to 1.49 lbs. PM10/bale.

Cotton Gin Emissions -
HAE = Emission Factor (lb PM10/Bale) x Baseline Period Production History (bales/yr)
HAE = 1.49 lb PM10/bale x 20,101.5 bales/yr
HAE = 29,951.2 lb PM10/yr

Natural Gas Combustion Emission Factors –

Natural Gas Emission Factors	
Pollutant	**Emission Factor (lb/MMBtu)**
NOx	0.1
SOx	0.003
CO	0.02
VOC	0.006
CO2e	0.063 (tons/gal)

ATTACHMENT D
Draft ERC Certificates

San Joaquin Valley
Air Pollution Control District

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

Emission Reduction Credit Certificate

DRAFT

C-1598-1

ISSUED TO: **ANDERSON CLAYTON CORP/SILVER CREEK #1**

ISSUED DATE: **<DRAFT>**

LOCATION OF REDUCTION: **43939 NORTH AVE**
FIREBAUGH, CA 93622

For VOC Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	39 lbs

Method Of Reduction

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

Shutdown of cotton ginning operation (permit unit C-1385-1-10).

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

Samir Sheikh, Executive Director / APCO

DRAFT

Brian Clements, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

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

Emission Reduction Credit Certificate

C-1598-2

DRAFT

ISSUED TO: ANDERSON CLAYTON CORP/SILVER CREEK #1

ISSUED DATE: <DRAFT>

LOCATION OF REDUCTION: 43939 NORTH AVE
FIREBAUGH, CA 93622

For NOx Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	706 lbs

Method Of Reduction

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

Shutdown of cotton ginning operation (permit unit C-1385-1-10).

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

Samir Sheikh, Executive Director / APCO

DRAFT

Brian Clements, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

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

Emission Reduction Credit Certificate

C-1598-3

DRAFT

ISSUED TO: **ANDERSON CLAYTON CORP/SILVER CREEK #1**

ISSUED DATE: **<DRAFT>**

LOCATION OF REDUCTION: **43939 NORTH AVE**
FIREBAUGH, CA 93622

For CO Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	141 lbs

Method Of Reduction

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

Shutdown of cotton ginning operation (permit unit C-1385-1-10).

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

Samir Sheikh, Executive Director / APCO

DRAFT

Brian Clements, Director of Permit Services

10/13/2026 2:59:46 PM -- ALEMANZ

San Joaquin Valley
Air Pollution Control District

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

Emission Reduction Credit Certificate

C-1598-4

DRAFT

ISSUED TO: **ANDERSON CLAYTON CORP/SILVER CREEK #1**

ISSUED DATE: **<DRAFT>**

LOCATION OF REDUCTION: **43939 NORTH AVE**
FIREBAUGH, CA 93622

For PM10 Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	15,921 lbs

Method Of Reduction

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

Shutdown of cotton ginning operation (permit unit C-1385-1-10).

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

Samir Sheikh, Executive Director / APCO

DRAFT

Brian Clements, Director of Permit Services

10/19/2026 3:23:41 PM -- ALEMANZ

San Joaquin Valley
Air Pollution Control District

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

Emission Reduction Credit Certificate

C-1598-5

DRAFT

ISSUED TO: **ANDERSON CLAYTON CORP/SILVER CREEK #1**

ISSUED DATE: **<DRAFT>**

LOCATION OF REDUCTION: **43939 NORTH AVE**
FIREBAUGH, CA 93622

For SOx Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	20 lbs

Method Of Reduction

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

Shutdown of cotton ginning operation (permit unit C-1385-1-10).

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

Samir Sheikh, Executive Director / APCO

DRAFT

Brian Clements, Director of Permit Services

San Joaquin Valley
Air Pollution Control District

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

Emission Reduction Credit Certificate

C-1598-22

DRAFT

ISSUED TO: **ANDERSON CLAYTON CORP/SILVER CREEK #1**

ISSUED DATE: **<DRAFT>**

LOCATION OF REDUCTION: **43939 NORTH AVE**
FIREBAUGH, CA 93622

For PM2.5 Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	2,547 lbs

Method Of Reduction

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

Shutdown of cotton ginning operation (permit unit C-1385-1-10).

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

Samir Sheikh, Executive Director / APCO

DRAFT

Brian Clements, Director of Permit Services

ATTACHMENT E
1997 Source Test Results

RECEIVED
San Joaquin Valley Unified
Air Pollution Control District

ANDERSON CLAYTON
3325 West Figarden
Fresno, CA 93711

Attn: Steve White

SILVER CREEK GIN #1
PM10 & TOTAL PARTICULATE TESTING
WAGON SUCTION, LINT CLEANER A, FEEDER DUST A, #3 HOT AIR FAN & BATTERY CONDENSER CYCLONES
ATC #C-1385-1-2
December 2 - 4, 1997

Submitted to
San Joaquin Valley Unified APCD
1999 Tuolumne Suite 200
Fresno, CA 93721

Attn: Gabe Lazar

Prepared by
AIRx TESTING
2175 Goodyear Avenue Unit #105
Ventura, CA 93003

Job Number
16031

Laboratory Report Number
397-028

Test Team Leader
Cam Donnahoo

BC

Results Verified By:
Tom Porter
Partner

Submitted
February 13, 1998

AIRx TESTING

PARTICULATE EMISSION SUMMARY

LINT A CYCLONE SYSTEM

	Run #1	Run #2	Run #3	Average
Total Particulate per Cyclone				
gr/DSCF	0.0079	0.0028	0.0073	*0.0060*
lb/hr	0.38	0.13	0.34	*0.28*
lb/bale	0.015	0.005	0.013	*0.011*
Total Particulate per System				
lb/hr	0.76	0.26	0.68	*0.57*
lb/bale	0.030	0.010	0.027	*0.022*
Particule Size Distribution				
+10μ (%)	67.9	42.9	76.8	*62.5*
-10μ (%)	32.1	57.1	23.2	*37.5*
<10μ Results per Cyclone				
-10μ (lb/hr)	0.12	0.08	0.08	*0.09*
-10μ (ib/bale)	0.005	0.003	0.003	*0.004*
<10μ Results per System				
-10μ (lb/hr)	0.24	0.16	0.16	*0.19* 4,56/
-10μ (lb/bale)	0.009	0.006	0.006	*0.007*
Average Std Bales/hr	25.5	26.4	25.3	*25.7*
Number of Cyclones in System				*2*

$$Q = \frac{.28\ LB}{HR} \times \frac{HR}{60\ MIN} \times \frac{7000\ GR}{LB} \div \frac{0.006\ LB}{DSCF} = 5,444\ SCF/MIN$$

5,545 SCFM AVE STD

PARTICULATE EMISSION SUMMARY

BATTERY CONDENSER CYCLONE SYSTEM

	Run #1	Run #2	Run #3	Average
Total Particulate per Cyclone				
gr/DSCF	0.0217	0.0174	0.0178	*0.0190*
lb/hr	1.12	0.89	0.91	*0.97*
lb/bale	0.055	0.045	0.040	*0.047*
Total Particulate per System				
lb/hr	2.24	1.78	1.82	*1.95*
lb/bale	0.110	0.090	0.080	*0.093*
Particule Size Distribution				
+10μ (%)	29.8	40.7	22.7	*31.1*
-10μ (%)	70.2	59.3	77.3	*68.9*
<10μ Results per Cyclone				
-10μ (lb/hr)	0.79	0.53	0.70	*0.67*
-10μ (lb/bale)	0.039	0.027	0.031	*0.032*
<10μ Results per System				
-10μ (lb/hr)	1.58	1.06	1.40	*1.35* 57.4/(DSCF)
-10μ (lb/bale)	0.077	0.054	0.061	*0.064*
Average Std Bales/hr	20.4	19.7	22.8	*21.0*
Number of Cyclones in System				*2*

$$Q = \frac{.97\ LB}{1\ hr} \times \frac{1\ hr}{60\ min} \times \frac{7000\ GR}{LB} \div \frac{0.019\ GR}{DSCF} = 5956\ SCF/min$$

BC

5,982 SCFM STD AVG

ATTACHMENT F
2004 Source Test Results

SAN JOAQUIN VALLEY UNIFIED
AIR POLLUTION CONTROL DISTRICT

MEMORANDUM

Date: 12/30/04
To: Source Test File
From: John Copp, AQI

Subject: Review of Source Test for Anderson Clayton – Silver Creek
November 10, 2004
ATC C-1385-1-7

Environmental Services and Testing was retained by Anderson Clayton Corporation to conduct a compliance emission test of a roller-type cotton gin served by 36 1D-3D cyclones. The following cyclones were tested: one 54" 1D-3D cyclone serving the lint cleaner #2 system and one 48" 1D-3D cyclone serving the lint trash system. There are a total of four 54" cyclones in the lint cleaner #2 system. The lint trash system has one 44" cyclone and two 48" cyclones. The units were tested under a normal operating mode. The source test measured only PM_{10}. Oxygen and carbon dioxide were assumed to be at ambient levels for this source. Compliance with specified cyclone inlet velocity ranges was also determined. The lint cleaner and lint trash systems are not served by a robber system; therefore inlet velocity was back-calculated from the measured cyclone outlet flow rate.

District compliance staff found notification, reporting, and source test protocols employed during this test to be satisfactory.

The data and calculations included in the report submittal were evaluated to ensure accuracy.

A review of the report submitted by Environmental Services and Testing on behalf of Farmers Firebaugh Ginning Company indicates that the 54" 1D-3D cyclone serving the lint cleaner #2 system and the 48" 1D-3D cyclone serving the lint trash system were successful in meeting the emission and cyclone velocity limitations specified in the ATC.

One 54" 1D-3D cyclone serving the lint cleaner #2 system

- **Per cyclone:**

PM_{10}	0.0016 gr/dscf	0.11 lb/hr	0.0049 lb/bale[1]
Flow (outlet)	8117 acfm		
Velocity (inlet)	3207 ft/min[2] (Specification: 3200 +/- 400 ft/min)		

[1] All bale values are reported as 500 lb bales.
[2] Inlet cyclone velocity for a cyclone system without a robber was calculated as follows:
V=Q/A, where Q is the inlet flow rate to one cyclone in the system
$A=D_c^2/8$, where D_c is equal to the cyclone diameter

- **Per system:**
  PM_{10} 0.0063 gr/dscf 0.43 lb/hr 0.020 lb/bale (Limit 0.1)

- **Average Ginning Rate:** 21.6 bale/hr

<u>One 48" 1D-3D cyclone serving the lint trash system</u>

- **Per cyclone:**
  PM_{10} 0.0032 gr/dscf 0.17 lb/hr 0.0084 lb/bale
  Flow (outlet) 6453 acfm
  Velocity (inlet) 3226 ft/min (Specification: 3200 +/- 400 ft/min)

- **Per system:**
  PM_{10} 0.0095 gr/dscf 0.51 lb/hr 0.025 lb/bale (Limit 0.1)

- **Average Ginning Rate:** 19.9 bale/hr

The inlet flow rate is assumed to be equal to the outlet flow rate