

MAY 28 2019

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

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

Dear Mr. Kostka:

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

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

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

Sincerely,



Arnaud Marjollet  
Director of Permit Services

AM:SP

Enclosures

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

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

Facility Name:	J.G. Boswell Company	Date:	May 22, 2019
Mailing Address:	PO Box 457, Corcoran, CA 93212	Engineer:	Silvana Procopio
Contact Person:	Nick Kostka	Lead Engineer:	Richard Karrs
Telephone:	559.762.3281		
Facility:	S-714		
Project #:	S-1183830		
Deemed Complete:	November 16, 2018		

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## **I. Summary**

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

On October 23, 2018, the District received an application from the operator requesting Emission Reduction Credits (ERCs) for criteria pollutants VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and SO<sub>x</sub> for the shutting down of the facility. On January 8<sup>th</sup> 2019, all facility permits were cancelled.

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

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

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

Bankable Emissions (lb/quarter)					
	NOx	SOx	PM10	CO	VOC
Q1	0	0	0	0	0
Q2	0	0	0	0	0
Q3	0	0	0	0	0
Q4	1,035	82	35,587	199	60

## II. Applicable Rules

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

## III. Location of Reductions

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

## IV. Method of Generating Reductions

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

### Equipment Description

- S-714-1-15:** DORMANT 13.5 MMBTU/HR SAW-TYPE COTTON GIN (GIN #11)
- S-714-2-0:** 18 MMBTU/HR ROLLER-TYPE COTTON GIN WITH MODULE FEEDER, TELESCOPE SUCTION, 4 TOWER DRYERS WITH ONE 2 MMBTU/HR AND TWO 8 MMBTU/HR NATURAL GAS/LPG BURNERS, 8 CLEANERS, 4 STICK MACHINES, 24 ROLLER GIN STANDS, OVERFLOW SYSTEM, 2 COMBING LINT CLEANERS, 2 AIR BLAST LINT CLEANERS, BATTERY CONDENSER, AND NON-PNEUMATIC TRASH SYSTEM

## V. Calculations

### A. Assumptions

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

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

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

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

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

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

		Annual Production (bales/year) Unit '2-0									
		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Q1		2,743									
Q4		51,783	43,636	46,998	51,166	65,025	56,667	37,479	13,318	25,724	24,937
<b>Total</b>		<b>54,526</b>	<b>43,636</b>	<b>46,998</b>	<b>51,166</b>	<b>65,025</b>	<b>56,667</b>	<b>37,479</b>	<b>13,318</b>	<b>25,724</b>	<b>24,937</b>

		UNIT 2-0 Annual Fuel Usage (therms/year)									
		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Q1		8,887									
Q4		173,137	129,103	161,193	153,502	173,075	144,357	86,130	38,366	78,919	67,530
<b>Total</b>		<b>182,024</b>	<b>129,103</b>	<b>161,193</b>	<b>153,502</b>	<b>173,075</b>	<b>144,357</b>	<b>86,130</b>	<b>38,366</b>	<b>78,919</b>	<b>67,530</b>

Source: ERC banking application submitted except year 2015, which emissions inventory amount was more conservative.

## B. Emission Factors (EF)

### Cotton Ginning Emissions:

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

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

For this facility, the 1<sup>st</sup> stage pre-cleaning system listed under unit ‘-2-0 was source tested in 2002 and the results for PM<sub>10</sub> were 0.252 lb<sub>PM10</sub>/500-lb bale. The permitted emission factor was 0.24 lb<sub>PM10</sub>/500-lb bale. Therefore, the permitted emission factor will be used.

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

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

### Natural Gas Combustion:

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

This unit was permitted to run on both natural gas and LPG fuel. Since the unit was only fired on natural gas, pursuant District Policy APR 1720; the SO<sub>x</sub> emission factor used will be 0.00285 lb/MMBtu instead of the permitted emission factor of 0.008 lb/MMBtu, which reflected the higher sulfur content of LPG.

**Unit S-714-2-0: DRYERS**

Pollutant	Emission Factor (lb/MMBtu)	Source
NOx	0.1	PTO S-714-2-0
SOx	0.00285	District Policy APR 1720
PM10	0*	PTO S-714-2-0
CO	0.02	
VOC	0.006	

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

**C. Baseline Period Determination and Data**

**Baseline Period Determination**

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

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

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

	Annual Production (bales/year) Unit '-2-0									
	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Q1	2,743									
Q4	51,783	43,636	46,998	51,166	65,025	56,667	37,479	13,318	25,724	24,937
<b>Total</b>	<b>54,526</b>	<b>43,636</b>	<b>46,998</b>	<b>51,166</b>	<b>65,025</b>	<b>56,667</b>	<b>37,479</b>	<b>13,318</b>	<b>25,724</b>	<b>24,937</b>
<b>10-yr Avg</b>	<b>41,948</b> NORMAL SOURCE OPERATION									

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

The baseline period is one consecutive two-year, three-year, four-year or five-year period within the last five years of operation that most accurately represents the normal source operation.

The average number of bales processed in 2 through 5-year increments from the 2013 through 2017 operating seasons are presented in the following table. For example, the 2-year average for the period 2013-2014 is as follows:

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

AVERAGE BALES IN RESPECTIVE PERIOD				
Baseline Period Ending In	2-year	3-year	4-year	5-year
2014	47,073			
2015	25,399	35,821		
2016	19,521	25,507	33,297	
2017	25,331	21,326	25,365	31,625

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

$$\begin{aligned}
 \text{2013-2014 Difference} &= \text{Normal Source Operation (bales/year)} - \text{2013-2014 Average (bales/year)} \\
 &= 41,948 - 47,073 \\
 &= - 5,125 \text{ bales/year}
 \end{aligned}$$

DIFFERENCE FROM NORMAL SOURCE OPERATION				
Baseline Period Ending In	2-year	3-year	4-year	5-year
2014	(5,125)			
2015	16,549	6,126		
2016	22,427	16,441	8,651	
2017	16,617	20,621	16,583	10,323

As shown above for bales produced, the period closest to the normal source operation is the 2-year period 2013-2014 and is, therefore, the baseline period. The number of bales produced and the quantity of natural gas combusted during the baseline period is shown below.

Baseline Data		
Year	Bales S-714-2	Therms S-714-2
2013	56,667	144,357
2014	37,479	86,130
<b>Average</b>	<b>47,073</b>	<b>115,244</b>

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

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

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

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

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

##### Cotton Ginning HAE

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

Historical Actual Emissions (HAE <sub>ginning</sub> )			
Pollutant	EF (lb-PM <sub>10</sub> /bale)	Throughput (bales/year)	HAE lb/year
PM <sub>10</sub>	0.84	47,073	39,541



Natural Gas Combustion HAE

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

Average fuel usage for baseline period 2013-2014:

$$\text{Average Fuel Usage} = (\text{Fuel Usage 2013} + \text{Fuel Usage 2014}) / 2$$

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

$$\begin{aligned} \text{Average fuel usage} &= (144,357 + 86,130) / 2 \\ &= 115,244 \text{ therms} \end{aligned}$$

<b>Historical Actual Emissions (HAE<sub>NG</sub>)</b>				
<b>Pollutant</b>	<b>EF lb/MMBtu</b>	<b>Fuel Usage therm/year</b>	<b>Conversion MMBtu/therm</b>	<b>HAE lb/year</b>
NO <sub>x</sub>	0.1	115,244	0.1	<b>1,152</b>
SO <sub>x</sub>	0.008	115,244	0.1	<b>92</b>
PM <sub>10</sub>	0	115,244	0.1	<b>0</b>
CO	0.02	115,244	0.1	<b>230</b>
VOC	0.006	115,244	0.1	<b>69</b>

**E. Adjustment to Historical Actual Emissions (HAE)**

Pursuant to Section 3.23 of Rule 2201, Historical Actual Emissions must be discounted for any emissions reduction which is: required or encumbered by any laws, rules, regulations, agreements, orders, or, proposed in the District Air Quality Plan for attaining the annual reductions required by the California Clean Air Act.

Emissions Adjusted for Rule 4204 - Cotton Gins

Rule 4204 requires cotton gins to use 1D-3D cyclones, with emissions equivalent to the emission factors from the latest revision of the CCGA handbook, by July 1, 2008. The cotton gin was in compliance with this rule at the time of the ERC application submittal. All the cotton gin's systems were controlled by 1D-3D cyclones. Therefore, no emissions adjustments are needed for this rule.

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

District Rule 4309, Section 4.1.6 specifically exempts units used to dry lint cotton or cotton at cotton gins. The dryers at this facility are used to dry cotton; therefore, the dryers in this operation are exempt from the requirements of this rule and no emissions adjustments are necessary.

Total Adjusted Historical Actual Emissions (HAE)

The total adjustment is equal to the sum of the adjusted parts. There were no adjustments made to the Historical Actual Emissions for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, or VOC. Therefore, the HAE will be equal to the values calculated in Section V.C of this evaluation.

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

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

**G. Air Quality Improvement Deduction**

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

AER = Adjusted HAE

AQID = AER × 10%

AER Calculations (lb/yr)			
Pollutant	AER	AQID	Bankable ERCs
NO <sub>x</sub>	1,152	117	1,035
SO <sub>x</sub>	92	10	82
PM <sub>10</sub>	39,541	3,954	35,587
CO	230	31	199
VOC	69	9	60

**H. Emission Reductions Eligible for Banking**

For the 2013-2014 baseline period, all operations took place in the 4<sup>th</sup> quarter. Therefore, the AER are only in the 4<sup>th</sup> quarter.

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

Bankable Emissions (lb/quarter)					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
Q1	0	0	0	0	0
Q2	0	0	0	0	0
Q3	0	0	0	0	0
Q4	1,035	82	35,587	199	60

## **VI. Compliance**

### **Rule 2201 - New and Modified Stationary Source Review Rule**

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

#### **1. Real**

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

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

#### **2. Surplus**

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

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

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

- Shutdown of the gin was voluntary and not required by any law, rule, agreement, or regulation.
- These ERCs are not needed for their current or proposed operations.
- The emission factors are not subject to additional adjustments and are, therefore, surplus to the requirements of the District's 2007 PM<sub>10</sub> Maintenance Plan, 2008, 2012, 2015, 2016, and 2018 PM<sub>2.5</sub> Attainment Plans, and District Rule 4204.
- According to the attached records, the gin did not exceed the permitted baling rates and there were no limits on natural gas consumption, so no adjustments are necessary on that basis.
- The emission reductions are not the result of an action taken by the permittee to comply with any requirement of Rule 4204 Cotton Gins.

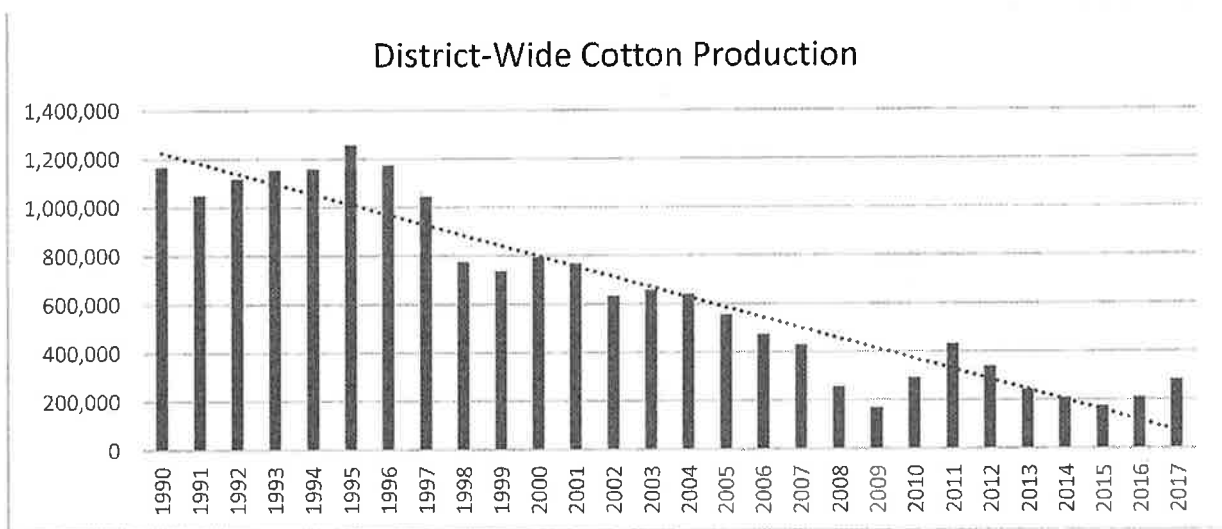
Therefore, the emission reductions satisfy the surplus requirement.

### 3. Permanent

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

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

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



Cotton acreage as reported by the California Cotton Ginners Association.

### 4. Quantifiable

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

### 5. Enforceable

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

Due to the size and complexity of the operation, the large bulk of the material processed, and the amount of lint, seeds, and waste material generated, it would be readily apparent

if it were to be operated in the future. Therefore, the emission reductions satisfy the enforceable requirement.

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

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

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

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

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

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

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

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

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

### **Rule 2301 Emission Reduction Credit Banking**

#### **Section 4.0 - Eligibility of Emission Reductions**

Section 4.2, specifies the criteria by which emission reductions that have occurred after September 19, 1991, are eligible for banking. The emission reductions in this project occurred when the PTOs for the cotton ginning equipment was surrendered, effective October 23, 2018. As these emission reductions occurred after September 19, 1991, the criteria in Section 4.2 has been satisfied.

Section 4.2.1 requires that the emission reductions are real, surplus, permanent, quantifiable, and enforceable. Discussion of compliance with Section 4.2.1 requirements has been addressed under Rule 2201 above and it has been determined that the emission reductions meet the criteria of this section.

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

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

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

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

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

## **Section 5.0 - ERC Certificate Application Procedures**

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

## **Section 6.0 - Registration of ERC Certificates**

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

- 6.1.1 A revised Permit to Operate has been issued if the emission reductions were created as a result of greater operating efficiencies or from the application of more efficient control technology.

- 6.1.2 If the emission reductions were created as a result of the shutdown of a permitted emissions unit, the relevant Permit(s) to Operate has been surrendered and voided.
- 6.1.3 If the emission reductions from a permitted emissions unit were created by means of reducing production or production rates, the relevant Permit(s) to Operate have been modified to reflect the emission reductions.
- 6.1.4 If the emission reductions were created as a result of the application of greater operating efficiencies or from the application of a more efficient control technology to a then non-permitted source.

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

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

#### **Rule 4201 Particulate Matter Concentration**

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

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

#### **Rule 4202 Particulate Matter - Emission Rate**

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

#### **Rule 4204 Cotton Gins**

The purpose of this rule is to limit PM<sub>10</sub> emissions from cotton ginning facilities and to provide the administrative requirements for monitoring, recordkeeping, and source testing for these facilities.

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

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

## **VII. Recommendation**

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

### **Appendices:**

- A: Cancelled PTOs
- B: PM<sub>2.5</sub> Fraction
- C: Source Test Results
- D: Emissions Inventory Reports
- E: Draft ERC Certificates

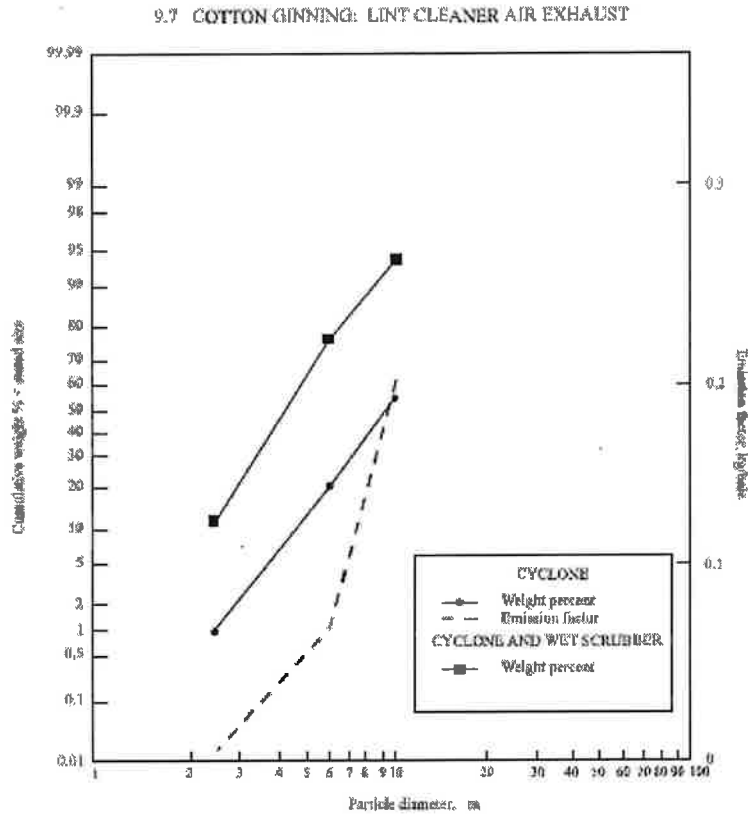


**Appendix A:  
Cancelled PTOs**

## **Appendix B: PM2.5 Fraction**

# PM<sub>2.5</sub> Fraction from EPA AP-42 Section 9.7 Appendix B-1

## 9.7 COTTON GINNING: LINT CLEANER AIR EXHAUST



Aerosolized particle diameter, $\mu$ m	Cumulative wt. % < stated size		Emission factor, $\mu$ g/bale Corrected with fabric filter
	After cyclone	After cyclone & wet scrubber	
2.5	1	11	0.044
6.0	20	74	0.07
10.0	54	92	0.26

Lint cleaners are the largest source of emissions from the cotton ginning process. Therefore, the PM<sub>2.5</sub> fraction of the PM<sub>10</sub> from lint cleaners is representative of the PM<sub>2.5</sub> fraction from the entire cotton gin. Based on the data in the chart above, the final PM<sub>2.5</sub> fraction is calculated to be:

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

**Appendix C:  
Source Test Results**

**Appendix D:  
Emissions Inventory Reports**

**Appendix E:**  
**Draft ERC Certificates**

**Appendix A:  
Cancelled PTOs**

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-714-1-15

**EXPIRATION DATE:** 12/31/2021

**SECTION:** 12 **TOWNSHIP:** 32S **RANGE:** 25E

**EQUIPMENT DESCRIPTION:**

**DORMANT** 13.5 MMBTU/HR SAW-TYPE COTTON GIN (GIN #11)

## PERMIT UNIT REQUIREMENTS

---

1. All machines/systems belonging to Gin #11 except the bale press shall be physically disconnected from their power source or rendered non-operational. [District Rule 4204]
2. None of the machines/systems belonging to Gin #11 except the bale press shall be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4204. [District Rule 4204]
3. Operation shall include 6 MMBtu/hr #1 heater, 3 MMBtu/hr #2 heater, 3 MMBtu/hr #3 heater and 1.5 MMBtu/hr Samuel Jackson moisturizer. [District Rule 2201]
4. Operation shall include 2 - 6 ft. horizontal screen cleaners, horizontal grid bar cleaner, 4 - 7 cylinder incline cleaners, 8 impact cleaners, 4 gin stands, 8 lint cleaners, 8 lint cleaner condensers, overflow system, battery condenser and bale press. [District Rule 2201]
5. Operation shall include motes handling system with 1 - 5 hp cleaner, 4" air line for motes cleaner trash, and 1 - 30 hp bale press. [District Rule 2201]
6. Operation shall include 1-150 hp unloading fans, 2-50 hp separator pull fans, 1-50 hp and 1-75 hp heater fans, 60 hp heater fan, and 2-40 hp incline cleaner pull fans, 50 hp overflow pull fan, 50 hp main trash fan, 40 hp master skimmer fan, 75 hp battery condenser fan, 25 hp moisturizer fan, 2-50 hp mote fans, 50 hp hot air pull fan, and 4-40 hp lint cleaner pull fans. [District Rule 2201]
7. Operation shall include slot skimmer serving module feeder and/or wagon suction assembly, 5 slot skimmers serving the 8 lint cleaners, and slot skimmer serving the battery condenser. [District Rule 2201]
8. Operation shall include 4-36 in. dia. 1D-3D cyclones serving overflow, main trash, and motes cleaner trash systems, 4-38 in. dia. 2D-2D cyclones serving incline cleaners, and 4-38 in. dia. 2D-2D cyclones serving separator pull fans, 4-38 in. dia. 2D-2D cyclones serving hot air pull fans, 2-60 in. dia. 2D-2D cyclones serving motes fan, 2-24 in. dia. 2D-2D cyclones serving seed lines, 1 1D-3D cyclone serving seed bin, and 1 1D-3D cyclone serving seed building. [District Rule 2201]
9. There shall be no baffles or other projections inside cyclones. [District Rule 2201]
10. Cotton gin trash shall be handled and disposed of in a manner preventing spontaneous ignition and/or fire hazard. [District Rule 2080]
11. Particulate matter (PM-10) emission rate for non-MAXXA variety shall not exceed 1.12 lb/equivalent 500 lb bale. PM10 emission rate for MAXXA variety shall not exceed 1.006 lb/equivalent 500 lb bale. [District Rule 2201]
12. PM10 emission rate shall not exceed 672 lb/day. [District Rule 2201]
13. Total combined PM10 emissions from permit units S-714-1 and '-2 shall not exceed 120,960 lbs per season. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.



14. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
15. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
16. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
17. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
18. Permittee shall maintain accurate records of amounts and varieties of cotton processed and calculated daily and cumulative season PM10 emissions each day and shall retain such records for a period of five years. Such records shall be made readily available to the District upon request. [District Rule 1070]

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-714-2-0

**EXPIRATION DATE:** 12/31/2021

**SECTION:** 12 **TOWNSHIP:** 32S **RANGE:** 25E

## **EQUIPMENT DESCRIPTION:**

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

## **PERMIT UNIT REQUIREMENTS**

---

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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

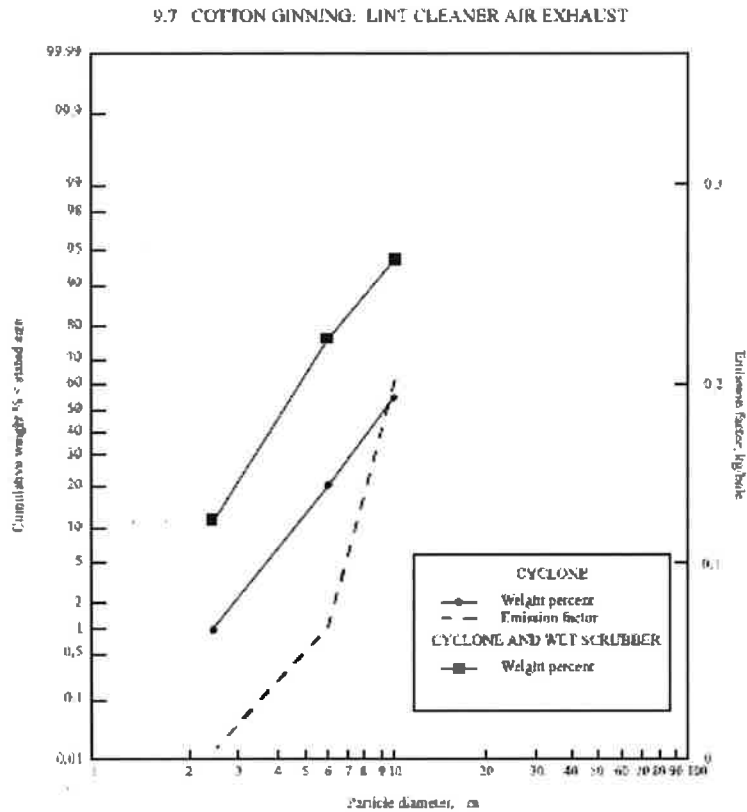
20. Emissions of PM10 from main trash system shall not exceed 0.06 lb/equivalent 500 lb bale. [District Rule 2201]
21. Dryer emissions rates shall not exceed any of the following: NOx: 0.1 lb/MMBtu, VOC: 0.006 lb/MMBtu, CO: 0.02 lb/MMBtu, PM10 0.01 lb/MMBtu, or SOx: 0.008 lb/MMBtu. [District Rule 2201]
22. District witnessed source testing to demonstrate compliance with PM10 emission limit shall be conducted on one 71" cyclone serving the 1st stage precleaner. [District Rule 1081]
23. District witnessed source testing to demonstrate compliance with PM10 emission limit shall be conducted on one 71" cyclone serving the 2nd stage precleaner. [District Rule 1081]
24. District witnessed source testing to demonstrate compliance with PM10 emission limit shall be conducted on one 50" cyclone serving the overflow. [District Rule 1081]
25. District witnessed source testing to demonstrate compliance with PM10 emission limit shall be conducted on one 76" cyclone serving the battery condenser. [District Rule 1081]
26. Source testing to measure PM and PM10 shall be conducted using EPA Methods 501 and 501A, respectively. [District Rule 1081]
27. Source testing shall be performed within 60 days of initial startup. [District Rule 1081]
28. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081]
29. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
30. Permittee shall maintain daily records specifying the following: a) date, b) number of bales of cotton produced, c) weight of bales produced, and d) volume of natural gas and propane burned. [District Rule 1070]
31. Permittee shall maintain accurate records of amounts of cotton processed and calculated daily and cumulative season PM10 emissions each day. [District Rule 1070]
32. Permittee shall maintain the records of operating schedule including: start-up date, last day of operation, hours per day of operation, days per season of operation, weight of cotton baled, and annual quantities of natural gas and propane burned. [District Rule 1070]
33. Records shall be maintained for a period of at least five years and made readily available for District inspection upon request. [District Rule 1070]

These terms and conditions are part of the Facility-wide Permit to Operate.

**Appendix B:  
PM2.5 Fraction**

# PM<sub>2.5</sub> Fraction from EPA AP-42 Section 9.7 Appendix B-1

## 9.7 COTTON GINNING: LINT CLEANER AIR EXHAUST



Arithmetic particle diameter, $\mu$ m	Cumulative wt. % - standard size		Emission factor, lb/bale Controlled with fabric filter
	After cyclone	After cyclone & wet scrubber	
2.5	1	11	0.04
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<sub>2.5</sub> fraction of the PM<sub>10</sub> from lint cleaners is representative of the PM<sub>2.5</sub> fraction from the entire cotton gin. Based on the data in the chart above, the final PM<sub>2.5</sub> fraction is calculated to be:

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

**Appendix C:  
Source Test Results**

Source Testing  
Year 2002

**AEROS ENVIRONMENTAL, INC.**

**SUMMARY OF RESULTS**

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

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

EMISSIONS	Single Cyclone			System lb/hr	System lb/500 lb bale	Permit Limit
	gr/DSCF	gr/SCF	lb/hr			
<b>Total</b>	0.05119	0.05040	5.749	11.50	0.528	
<b>Particulate Matter (PM)</b>	0.04972	0.04875	5.667	11.33	0.521	
<b>Mean:</b>	0.04520	0.04432	5.152	10.30	0.485	
	0.04870	0.04782	5.523	11.05	0.511	N/A
<b>% PM 10</b>	47.5					
	49.0					
	51.5					
<b>PM 10</b>	0.02431	0.02394	2.731	5.46	0.251	
	0.02436	0.02389	2.777	5.55	0.255	
	0.02328	0.02283	2.653	5.31	0.250	
<b>Mean:</b>	0.02399	0.02355	2.720	5.44	0.252	0.24 lb/500 lb bale
<b>Process Rate</b>						
<b>500 lb bale/hr</b>						
<b>Process Conditons</b>						21.77
						21.77
						21.25
$\bar{x}$ 21.60						
<b>Comments:</b> System Emissions derived by multiplying single cyclone emissions by two						

**AEROS ENVIRONMENTAL, INC.**

**SUMMARY OF RESULTS**

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

Project 198-2780  
 December 3, 2002  
 ATC No. S-714-2-0

EMISSIONS	Single Cyclone			System lb/hr	System lb/500 lb bale	Permit Limit
	gr/DSCF	gr/SCF	lb/hr			
Total	0.00757	0.00752	1.080	2.16	0.121	
Particulate Matter (PM)	0.00713	0.00708	0.969	1.94	0.088	
Mean:	0.00670	0.00665	0.910	1.82	0.091	
	0.00714	0.00708	0.986	1.97	0.100	N/A
% PM 10	66.4					
	64.4					
	64.0					
PM 10	0.00503	0.00500	0.717	1.43	0.080	
	0.00459	0.00456	0.624	1.25	0.057	
	0.00429	0.00426	0.582	1.16	0.058	
Mean:	0.00464	0.00460	0.641	1.28	0.065	0.1 lb/500 lb bale
						Process Rate 500 lb bale/hr
Process Conditons						17.83 22.06 19.97
<b>Comments:</b> <u>System Emissions derived by multiplying single cyclone emissions by two</u>						



**AEROS ENVIRONMENTAL, INC.**

**SUMMARY OF RESULTS**

J. G. Boswell Company  
 Gin #10  
 Overflow System

Project 198-2780  
 December 4, 2002  
 ATC No. S-714-2-0

EMISSIONS	Single Cyclone			System lb/hr	System lb/500 lb bale	Permit Limit
	gr/DSCF	gr/SCF	lb/hr			
Total	0.00465	0.00461	0.357	0.71	0.032	
Particulate	0.00541	0.00534	0.396	0.79	0.037	
Matter (PM)	0.00420	0.00414	0.308	0.62	0.029	
Mean:	0.00475	0.00470	0.354	0.71	0.033	N/A
% PM 10	65.0					
	69.0					
	77.0					
PM 10	0.00302	0.00299	0.232	0.46	0.021	
	0.00373	0.00368	0.273	0.55	0.025	
	0.00323	0.00319	0.237	0.47	0.022	
Mean:	0.00333	0.00329	0.247	0.49	0.023	0.06 lb/500 lb bale
						Process Rate 500 lb bale/hr
Process Conditons						22.19
						21.54
						21.22
<b>Comments:</b> System Emissions derived by multiplying single cyclone emissions by two						

**AEROS ENVIRONMENTAL, INC.**

**SUMMARY OF RESULTS**

J. G. Boswell Company  
 Gin #10  
 2nd Stage Precleaning System

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

EMISSIONS	Single Cyclone			System lb/hr	System lb/500 lb bale	Permit Limit
	gr/DSCF	gr/SCF	lb/hr			
Total	0.01253	0.01236	1.457	2.91	0.182	
Particulate	0.01500	0.01466	1.718	3.44	0.171	
Matter (PM)	0.01445	0.01412	1.655	3.31	0.155	
<i>Mean:</i>	0.01399	0.01372	1.610	3.22	0.170	N/A
% PM 10	50.0					
	47.0					
	47.0					
PM 10	0.00626	0.00618	0.729	1.46	0.091	
	0.00705	0.00689	0.808	1.62	0.081	
	0.00679	0.00664	0.778	1.56	0.073	
<i>Mean:</i>	0.00670	0.00657	0.771	1.54	0.082	0.24 lb/500 lb bale
						Process Rate 500 lb bale/hr
Process Conditons						15.98 20.05 21.32
<i>Comments:</i> System Emissions derived by multiplying single cyclone emissions by two						

**Appendix D:  
Emissions Inventory Reports**

S-1094180

Emission Statement - Calendar Year 2008 Emissions

3/26/2009 11:45:42 AM

Facility ID # S - 714  
TAD # 15 - 714  
SIC 724  
Facility Name J G BOSWELL COMPANY  
TOXID # 0  
NAICS 115111

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

Received

AUG 03 2009  
Permits Svc SJVAPCD

Planning Inventory: COTTON GIN  
Update Summary


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

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL:  Y

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Source Classification Code	Units	NOX Lb / Unit	VOC Lb / Unit	SOX Lb / Unit	CO Lb / Unit	PM10 Lb / Unit	NH3 Lb / Unit	(Tons/Yr)
1	1	Cotton Gin	0	BALES OF COTTON	30200406	.0	.0	.0	.0	4.28	.0	(Tons/Yr)
1	2	Natural Gas Combustion	0	MILLION CUBIC FEET BURNED	30290003	100.0	6.0	3.0	20.0	.0	.0	(Tons/Yr)
2	1	Cotton Gin - Roller BOS	18.20	BALES OF COTTON	30200408	.0	.0	.0	.0	1.07	.0	(Tons/Yr)
2	2	Natural Gas-Fired Burners	18.20	MILLION CUBIC FEET BURNED	30290003	100.0	2.3	.6	21.0	4.5	.0	(Tons/Yr)
Totals For the Facility (TONS / YEAR)						91	.02	.00	1.1	36.13	.0	

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

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

Signature of Responsible Official and Date  
  
7/29/09

REPORTING BY CALENDAR YEAR

(PLEASE SEE ATTACHED SPREADSHEET)

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

Last Updated By KEELERK

Date / Time Printed  
2/23/2010  
10:54:03 AM

UTM Zone : 11  
UTM East: 295.724  
UTM North: 3892.77

Emission Statement - Calendar Year 2009 Emissions

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

S-714  
S-1103776  
Received

Facility ID # S - 714  
TAD # 15 - 714  
SIC 724  
Facility Name J G BOSWELL COMPANY  
TOXID # 0

NAICS 115111  
100000  
2010

Permits SIVC  
SJVAPCD

Planning Inventory: / Electronic  
Update Summary

Y

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL :

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Units	NOX Lb / Unit	VOC Lb / Unit	SOX Lb / Unit	CO Lb / Unit	PM10 Lb / Unit	NH3 Lb / Unit	(Tons/Yr)
1	1	Cotton Gin	0	BALES OF COTTON 30200406	.0	.0	.0	.0	1.12	.0	(Tons/Yr)
1	2	Natural Gas Combustion	0	MILLION CUBIC FEET BURNED	100.0	6.0	3.0	20.0	.0	.0	(Tons/Yr)
2	1	Cotton Gin - Roller	<del>54526</del> 43,636	BALES OF COTTON 30200408	.0	.0	.0	.0	1.07	.0	(Tons/Yr)
2	2	Natural Gas-Fired Burners	<del>18.2</del> 12.91	MILLION CUBIC FEET BURNED 30290003	100.0	2.3	.6	21.0	4.5	.0	(Tons/Yr)

Handwritten notes: .00001, .00005, .00013, 24.44, 1.0000, .0000

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

REPORTING BY CALENDAR YEAR

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

Last Updated By BOTILLB

# Emission Statement - Calendar Year 2010 Emissions

J.G. BOSWELL COMPANY

Date 7/29/2011

Please Sign and return to:

San Joaquin Valley Unified APCD  
1990 East Gettysburg Avenue  
Fresno, CA 93726

UTM

Zone: 11  
East: 295.724  
North: 3892.77

Facility ID #: S-714

TAD #: 15-714

SIC: 724

Facility Name: J.G. BOSWELL COMPANY

Toxic ID #:

S-11368A

X

Check Box If Process Rates are Confidential :

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Units		NOX lb / Unit	VOC Lb / Unit	SOX lb / Unit	CO lb / Unit	PM10 Lb / Unit	NH3 Lb / Unit	Tons /Yr.
				Source Classification Code								
1	1	Cotton Gin - Bales	0.00	BALES OF COTTON		0.00	0.00	0.00	0.00	0.00		
1	2	Natural Gas Combustion - Heaters	0.00	MILLION CUBIC FEET BURNED	30290003	0.00	0.00	0.00	0.00	0.00		
2	1	Cotton Gin - Bales	46998.00	BALES OF COTTON		0.00	0.00	0.00	0.00	0.00		
2	2	Natural Gas Combustion - Heaters	19.32	MILLION CUBIC FEET BURNED	30290003	0.97	0.06	0.08	0.19	26.42		
Totals For the Facility (Tons/Year)												
						0.97	0.06	0.08	0.19	26.42		

Contact	DENNIS TRISTAO
Company	J.G. BOSWELL COMPANY
Address	PO BOX 457
City, State, Zip	CORCORAN, CA 93212
Telephone	(559) 9922141
Email Address	ccurtis@jgboswell.com
Location of facility if different from above	J.G. BOSWELL COMPANY 710 BAINUM AVE

J.G. BOSWELL COMPANY

9-1120929

Emission Statement - Calendar Year 2011 Emissions

Date 2/15/2012  
Time 11:18:46 AM  
UTM Zone 11  
East 295 72397  
North 3892 7745

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

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

Y

Check Box if Process Rates are Confidential:

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	Tons / Yr.
1	1	Cotton Gin - Bales	0.00	BALES OF COTTON	30200406	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1	2	Natural Gas Combustion - Heaters	0.00	MILLION CUBIC FEET BURNED	30290003	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2	1	Cotton Gin - Roller - Bales	51,166.00	BALES OF COTTON	30200408	0.00	0.00	0.00	0.00	1.07	0.00	0.00
2	2	Natural Gas Combustion - Heaters	15.35	MILLION CUBIC FEET BURNED	30290003	0.77	0.05	0.06	0.15	1.87	0.00	0.00
Totals For the Facility (Tons/Year)												

Contact: DENNIS TRISTAO  
Company: J.G. BOSWELL COMPANY  
Address: P O BOX 457  
City/State/Zip: CORCORAN, CA 93212  
Telephone: (559) 9922141  
Email Address:  
Location of facility: 31500 SOUTH LAKE ROAD  
if different from above: BAKERSFIELD

FACILITY WIDE RELATIVE MONTHLY ACTIVITY

S-714

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

DEFULT MONTHLY RELATIVE MONTHLY ACTIVITY	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33
	0	0	0	0	0	0	0	0	0	25	36	37
												100

Daily Activity  
Please indicate normal operating schedule:

Number of hours worked each day:	Sunday
	24
	24
	24
	24
	24
	24
	24

S-1131287

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

Date: 1/22/2013  
 Time: 12:23:46 PM

UTM  
 Zone: 11  
 East: 295.724  
 North: 3892.774

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

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

*Corrections*

Y

Check Box If Process Rates are Confidential :

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Units		NOX lb / Unit	VOC Lb / Unit	SOX lb / Unit	CO lb / Unit	PM10 Lb / Unit	NH3* Lb / Unit	Tons /Yr.
				Source Classification Code								
1	1	Cotton Gin - Bales	0.00	BALES OF COTTON		0.00	0.00	0.00	0.00	0.00	0.00	0.00
1	2	Natural Gas Combustion - Heaters	0.00	30200406		0.00	0.00	0.00	0.00	0.00	0.00	0.00
2	1	Cotton Gin - Roller - Bales	65,025	MILLION CUBIC FEET BURNED		0.00	0.00	0.00	0.00	0.00	0.00	0.00
2	2	Natural Gas Combustion - Heaters	16.93	30290003		0.00	0.00	0.00	0.00	1.07	0.00	0.00
				MILLION CUBIC FEET BURNED		0.00	0.00	0.00	0.00	34.79	0.00	0.00
				30290003		0.86	0.05	0.07	0.17	0.00	0.00	0.00
				Totals For the Facility (Tons/Year)		0.86	0.05	0.07	0.17	34.79	0.00	0.00

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

Contact	DENNIS TRISTAO
Company	J G BOSWELL COMPANY
Address	P O BOX 457
City, State, Zip	CORCORAN, CA 93212
Telephone	(559) 9922141
Email Address	
Location of facility if different from above	31500 SOUTH LAKE ROAD BAKERSFIELD



S1143056

**Emission Inventory - Calendar Year 2013 Statement**

Date Printed: 7/2/2014 / 4:15:05PM

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

Confidential Process Rates: YES

*Comp 3/28/14*  
 \* Please Note: Emissions for NH3 are reported in Lbs / Year

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Units Source Classification Code	Emissions (Lb / Unit)							NH3* Lb / Unit
					NOX	VOC	SOX	CO	PM10	NH3*		
1	1	Cotton Gin - Bales	0.00	BALES OF COTTON 30200406	0.00	0.00	0.00	0.00	0.00	1.12	0.00	0.00
1	2	Natural Gas Combustion - Heaters	0.00	MILLION CUBIC FEET BURNED 30290003	100.00	6.00	3.00	20.00	0.00	0.00	0.00	0.00
2	1	Cotton Gin - Roller - Bales	56667.00	BALES OF COTTON 30200408	0.00	0.00	0.00	0.00	0.00	1.07	0.00	0.00
2	2	Natural Gas Combustion - Heaters	14.07	MILLION CUBIC FEET BURNED 30290003	102.60	6.16	8.21	20.52	0.00	30.32	0.00	0.00
<b>Totals For the Facility (Tons / Year)</b>					<b>0.72</b>	<b>0.04</b>	<b>0.06</b>	<b>0.14</b>	<b>0.00</b>	<b>30.32</b>	<b>0.00</b>	<b>0.00</b>

<b>Contact</b>	Dennis Tristao	<b>Name and Title of Responsible Official</b>
<b>Company</b>	J G BOSWELL COMPANY	
<b>Address</b>	P O BOX 457	
<b>City, State, Zip</b>	CORCORAN, CA 93212	
<b>Telephone</b>	(559) 992-2141	
<b>E-mail</b>	ccurtis@jgboswell.com	
<b>Location of facility, if different from above</b>	31500 SOUTH LAKE ROAD BAKERSFIELD, CA 93311	

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

S-1157496

**Emission Statement - Calendar Year 2014 Emissions**

Date 3/18/2015  
Time 12:13:15 PM

UTM  
Zone : 11  
East : 296.17317  
North : 3892.3343

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

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

Y

Check Box if Process Rates are Confidential :

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	* Please Note: Emissions for NH3 are reported in Lbs / Year.
1	1	Cotton Gin - Bales	0.00	BALES OF COTTON	30200406	0.00	0.00	0.00	0.00	1.12	0.00	Tons/Yr.
1	2	Natural Gas Combustion - Heaters	0.00	MILLION CUBIC FEET BURNED	100.00	0.00	0.00	3.00	20.00	0.00	0.00	Tons/Yr.
2	1	Cotton Gin - Roller - Bales	37479.00	BALES OF COTTON	30200408	0.00	0.00	0.00	0.00	1.07	0.00	Tons/Yr.
2	2	Natural Gas Combustion - Heaters	8.34	MILLION CUBIC FEET BURNED	103.21	0.43	0.03	8.26	20.64	0.00	0.00	Tons/Yr.
Totals For the Facility (Tons/Year)						0.43	0.03	0.03	0.09	20.05	0.00	

Contact Dennis Tristao  
Company J G BOSWELL COMPANY  
Address P O BOX 457  
City, State, Zip CORCORAN, CA 93212  
Telephone (559) 992-2141  
Email Address  
Location of facility 31500 S LAKE RD  
if different BAKERSFIELD  
from above

**FACILITY WIDE RELATIVE MONTHLY ACTIVITY**

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

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
DEFAULT MONTHLY	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33	8.33
RELATIVE MONTHLY	0	0	0	0	0	0	0	0	0	31.73	50.05	18.22

**Daily Activity**

Please indicate normal operating schedule:

Day	Number of hours worked each day:
Sunday	24
Monday	24
Tuesday	24
Wednesday	24
Thursday	24
Friday	24
Saturday	24

5-7161162

**Emission Statement - Calendar Year 2015 Emissions**

Date 3/22/2016  
Time 10:43:29 AM

UTM  
Zone : 11  
East : 296.17317  
North : 3892.3343

**Please return to:**

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

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

Y

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

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Units		NOX lb / Unit	VOC Lb / Unit	SOX lb / Unit	CO lb / Unit	PM10 Lb / Unit	NH3* Lb / Unit	Tons/Yr.
				Source Classification Code	Units							
1	1	Cotton Gin - Bales	0.00	BALES OF COTTON	30200406	0.00	0.00	0.00	0.00	1.12	0.00	0.00
1	2	Natural Gas Combustion - Heaters	0.00	MILLION CUBIC FEET BURNED	30290003	100.00	6.00	3.00	20.00	0.00	0.00	0.00
2	1	Cotton Gin - Roller - Bales	13318.00	BALES OF COTTON	30200408	0.00	0.00	0.00	0.00	1.07	0.00	0.00
2	2	Natural Gas Combustion - Heaters	3.71	MILLION CUBIC FEET BURNED	30290003	104.69	6.28	8.38	20.94	0.00	0.00	0.00
<b>Totals For the Facility (Tons/Year)</b>						<b>0.194</b>	<b>0.012</b>	<b>0.016</b>	<b>0.039</b>	<b>7.125</b>	<b>0.000</b>	<b>0.000</b>

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

<b>Contact</b>	Dennis Tristao
<b>Company</b>	J G BOSWELL COMPANY
<b>Address</b>	P O BOX 457
<b>City, State, Zip</b>	CORCORAN, CA 93212
<b>Telephone</b>	(559) 992-2141
<b>Email Address</b>	
<b>Location of facility if different from above</b>	31500 S LAKE RD BAKERSFIELD

9-117132

**Emission Statement - Calendar Year 2016 Emissions**

Date 3/13/2017  
Time 1:17:47 PM

UTM  
Zone 11  
East 296.17317  
North 3892.33431

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

Facility ID # S-714  
TAD # 15-714  
SIC 724  
Facility Name J G ROSWELL COMPANY  
Toxic ID # 0



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

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Units		NOX lb / Unit	VOC Lb / Unit	SOX lb / Unit	CO lb / Unit	PM10 Lb / Unit	NH3* Lb / Unit	Tons/Yr.
				Source Classification Code								
1	1	Cotton Gin - Bales - Dormant	0.00	BALES OF COTTON		0.00	0.00	0.00	0.00	1.12	0.00	0.00
				30200406		0.00	0.00	0.00	0.00	0.00	0.00	0.00
1	2	Total 13.5 MMBtu/hr Heaters - NG - Dormant	0.00	MILLION CUBIC FEET BURNED		100.00	6.00	3.00	20.00	0.00	0.00	0.00
				30290003		0.00	0.00	0.00	0.00	0.00	0.00	0.00
2	1	Cotton Gin - Roller - Bales of Cotton	25724.00	BALES OF COTTON		0.00	0.00	0.00	0.00	1.07	0.00	0.00
				30200408		0.00	0.00	0.00	0.00	13.76	0.00	0.00
2	2	Total 18 MMBtu/hr Heaters - NG	7.64	MILLION CUBIC FEET BURNED		103.30	6.20	8.26	20.66	0.00	0.00	0.00
				30290003		0.39	0.02	0.03	0.08	0.00	0.00	0.00
2	3	Total 18.0 MMBtu/hr Heaters - LPG	0.00	1000 GALLONS BURNED		9.05	0.54	0.72	1.81	0.91	0.00	0.00
				30290005		0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals For the Facility (Tons/Year)						0.395	0.024	0.032	0.079	13.762	0.000	0.000

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

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

**Emission Statement - Calendar Year 2017 Emissions**

Date / Time Printed 07/11/2018 / 3:48:03 PM

UTM Zone: 11  
 UTM East: 296.173  
 UTM North: 3892.33

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

Facility ID # S - 714  
 TAD # 15 - 714  
 SIC # 724  
 Facility Name J G BOSWELL COMPANY  
 TOXID # 0  
 Planning Inventory / Electronic

**CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL :**  **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 - BALES - DORMANT	0	BALES OF COTTON	0	0	0	0	1.12	0	(Tons/Yr)
1	2	TOTAL 13.5 MMBTU/HR HEATERS - NG - DORMANT	0	MILLION CUBIC FEET BURNED	100.0	6.0	3.0	20.0	0	0	(Tons/Yr)
2	1	COTTON GIN - ROLLER - BALES OF COTTON	24937	BALES OF COTTON	0	0	0	0	1.07	0	(Tons/Yr)
2	2	TOTAL 18 MMBTU/HR HEATERS - NG	6.59	MILLION CUBIC FEET BURNED	102.43	6.15	8.2	20.49	0	0	(Tons/Yr)
2	3	TOTAL 18.0 MMBTU/HR HEATERS - LPG	0	1000 GALLONS BURNED	134	102	103	07	0	0	(Tons/Yr)
<b>Totals For the Facility (Tons / Year)</b>					<b>0.34</b>	<b>0.02</b>	<b>0.03</b>	<b>0.07</b>	<b>13.34</b>	<b>0.0</b>	

Contact Dennis Tristao  
 Company J G BOSWELL CO  
 Address PO BOX 457  
 City, State, Zip CORCORAN, CA 93212  
 Telephone (559) 992 - 2141  
 Email: dtristao@jgboswell.com  
 Location of facility if different from above J G BOSWELL COMPANY  
 31500 S LAKE RD  
 BAKERSFIELD, CA

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.

**Appendix E:  
Draft ERC Certificates**

San Joaquin Valley  
Air Pollution Control District

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

**Emission Reduction Credit Certificate**

**DRAFT**  
S-5079-1

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

For VOC Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	60 lbs

**Method Of Reduction**

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

Shutdown of cotton gin facility

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

Samir Sheikh, Executive Director / APCO

**DRAFT**

Arnaud Marjollet, Director of Permit Services

San Joaquin Valley  
Air Pollution Control District

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

**Emission Reduction Credit Certificate**

**DRAFT**  
S-5079-2

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

For NOx Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	1,035 lbs

**Method Of Reduction**

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

Shutdown of cotton gin facility

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

Samir Sheikh, Executive Director / APCO

**DRAFT**

Arnaud Marjollet, Director of Permit Services



San Joaquin Valley  
Air Pollution Control District

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

**Emission Reduction Credit Certificate**

**DRAFT**  
S-5079-3

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

For CO Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	199 lbs

**Method Of Reduction**

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

Shutdown of cotton gin facility

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

Samir Sheikh, Executive Director / APCO

**DRAFT**

Arnaud Marjollet, Director of Permit Services

San Joaquin Valley  
Air Pollution Control District

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

Emission Reduction Credit Certificate

**DRAFT**  
S-5079-4

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

For PM10 Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	35,587 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	676 lbs

**Method Of Reduction**

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

Shutdown of cotton gin facility

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

Samir Sheikh, Executive Director / APCO

**DRAFT**

Arnaud Marjollet, Director of Permit Services

San Joaquin Valley  
Air Pollution Control District

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

**Emission Reduction Credit Certificate**

**DRAFT**  
S-5079-5

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

For SOx Reductions In The Amount Of:

Quarter 1	Quarter 2	Quarter 3	Quarter 4
None	None	None	91 lbs

**Method Of Reduction**

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

Shutdown of cotton gin facility

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

Samir Sheikh, Executive Director / APCO

**DRAFT**

Arnaud Marjollet, Director of Permit Services