Background Report Reference

AP-42 Section Number: 9.7

Background Chapter: 4

Reference Number: 19

Title: Written Communication from Thomas E. Goff, San Joaquin Valley Unified Air pollution Control District, Bakersfield, CA, to Dallas Safriet

U.S. EPA

October 1995

Recd 11/21/95

AP-42 Section 9.7
Reference —
Report Sect. 4
Reference 19

San Joaquin Valley Unified Air Pollution Control District

October 26, 1995

Dallas Safriet
U.S. Environmental Protection Agency
Emission Factor and Inventory Group (MD-14)
Research Triangle Park, NC 27711

Re: Revised Draft Report for AP-42 Section 9.7, Cotton Ginning

Dear Mr. Safriet:

Thank you for the opportunity to review the draft revised AP-42 section on cotton ginning. Overall the report appears to provide a thorough update to the current AP-42 section. The following four areas may need to be corrected or additional review may prove beneficial.

Draft table 9.7-1/page 9.7-7 and table 9.7-2/page 9.7-8 indicate that cotton grown in the San Joaquin Valley of California is harvested by stripping. As discussed elsewhere in the text, virtually all cotton grown in the San Joaquin Valley is picker cotton. A review of all facilities in the SJV used to develop emission factors (Ref. #1-9) shows that source tests represent picker cotton.

The total emission factor in draft table 9.7-3 is unusually low. A review of gins operating in the District showed several gins equipped with more efficient control equipment (1D-3D and 2D-2D cyclones rather than 2D-2D cyclones, perforated drums and mesh screens) operate at emission rates greater than 0.66 lb PM/bale. A typical range for a gin controlled by a combination of cyclones is 0.75 to 1.0 lb PM10/bale. It is unlikely the 0.66 lb PM/bale would accurately represent the emission rate for gins with the controls described in draft table 9.7-3.

There is some equipment in use in the District which is not discussed in the draft section. Roller gin stands which use rollers rather than saws to separate the seeds from the cotton lint are sometimes used for "pima" long staple cotton. The use of plenum chambers followed by cyclones is becoming more common as a control strategy. Also, the use of enclosed augers in place of pneumatic conveyance followed by cyclones is increasing, particularly for trash handling.

Finally, several source tests were done during the 1994 ginning season. If you wish to include more tests in your data, these can be made available for inclusion.

David L. Crow
Executive Director/Air Pollution Control Officer

1999 Tuolumne Street, Suite 200 • Fresno, CA 93721 • (209) 497-1000 • FAX (209) 233-2057

Northern Region
4230 Kiernan Avenue, Suite 130 • Modesto, CA 95356
(209) 545-7000 • Fax (209) 545-8652

Central Region
1999 Tuolumne Street, Suite 200 • Fresno, CA 93721
(209) 497-1000 • Fax (209) 233-2057

Southern Region
2700 M Street, Suite 275 • Bakersfield, CA 93301
(805) 861-3682 • Fax (805) 861-2060

Thank you for your cooperation. Should you have any questions, please telephone Mr. Thomas Goff of Permit Services at (805) 861-3682.
862-5200

Sincerely,

Seyed Sadredin
Director of Permit Services

T. Goff

Thomas E. Goff, P.E.
Permit Services Manager - Southern Region

DMR