

Note: This is a reference cited in *AP 42, Compilation of Air Pollutant Emission Factors, Volume I Stationary Point and Area Sources*. AP42 is located on the EPA web site at www.epa.gov/ttn/chief/ap42/

The file name refers to the reference number, the AP42 chapter and section. The file name "ref02_c01s02.pdf" would mean the reference is from AP42 chapter 1 section 2. The reference may be from a previous version of the section and no longer cited. The primary source should always be checked.

Background Report Reference

AP-42 Section Number: 9.7

Background Chapter: 4

Reference Number: 18

Title: Written Communication from Roger A. Isom, California Cotton Ginners Association, Fresno, CA, to Dallas Safriet

U.S. EPA

October 1995

Rec'd 10/19/95
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CALIFORNIA COTTON GINNERS ASSOCIATION

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AP-42 Section 9.7
Reference
Report Sect. 4
Reference 10

October 2, 1995

Mr. Dallas Safriet
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Emission Factor Inventory Group (MD-14)
U.S. ENVIRONMENTAL PROTECTION AGENCY
Research Triangle Park, NC 27711

Re: **Proposed Revisions to AP-42: Section 9.7 Cotton Ginning**

Dear Mr. Safriet,

On behalf of the 110 cotton gins in California, I would like to express our thanks for the opportunity to comment on the proposed revisions to AP-42, Section 9.7: Cotton Ginning. As you know from previous discussions on this issue, our industry has some serious concerns on any revisions to AP-42. History has shown that AP-42 has been used as a regulatory tool for setting emissions standards, as opposed to an emission factor reference document, which is the actual intent of AP-42. On that premise, we have completed our review of the proposed revisions and would like to offer the following comments.

First and foremost, the majority of the actual source tests referenced in the document were conducted in California. In each of the references, it was indicated that the cotton ginned at each of the gins was stripper harvested. This is an absolute falsehood. **All cotton ginned in California is spindle picked (picker harvested).** Any reference to this must be changed throughout the document, including the emission factor tables.

Secondly, we would like to comment on "Reference 10", which is the Halls Gin in Halls, Tennessee. It is stated on page 4-8 that the testing was conducted using a Radar High Volume sampler. This is a totally unacceptable method for determining PM10 emissions from a cotton gin. It does not provide for isokinetic sampling as is required by EPA as set forth in EPA Method 5 for total particulate (PM) and EPA method 201A for PM10. Furthermore, it was mentioned that the testing report did not discuss cyclonic flow. All testing performed on cotton gins in California utilized a "straightening vane" to eliminate the cyclonic flow. Any testing performed without the use of the straightening vane is invalid and must be rejected. All of the emissions testing performed on cotton gins in California were performed using a California Air Resources Board (CARB) certified source test contractor and using EPA and CARB approved source test methods and equipment. Considering this, and the fact that even the gins tested in California that utilized "1D-3D" cyclones on all emission points, none of the gins were able to achieve the emissions indicated by the Halls Gin source test. Based on this evidence, it is obvious that the



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emissions from Halls Gin in Tennessee are questionable, since they were estimated using unapproved source tests methods. Therefore, we would recommend that the data from the Halls Gin not be utilized, as it does not reflect true and accurate emissions from cotton gins.

Upon review of the California source test data, it should be noted that this reflects only a portion of the tests that have been conducted. There have been considerably more emissions tests performed in California, and these tests should be reviewed and incorporated as possible. Most of these tests occurred within the San Joaquin Valley Unified A.P.C.D.

As we stated in the beginning of this letter, our experience demonstrates that AP-42 has been used to set emissions standards, with which industry must comply. Therefore, it is extremely critical that AP-42 put forth credible and accurate data that truly represents emissions from cotton gins. We hope that you take our comments into consideration when finalizing this document. Again, we would like to thank you for the opportunity to comment on these proposed revisions, and feel free to contact me should you have any questions regarding our comments.

Sincerely,



Roger A. Isom
Director of Technical Services

c: Fred Johnson, NATIONAL COTTON GINNERS ASSOCIATION
Earl P. Williams, CALIFORNIA COTTON GINNERS ASSOCIATION
CCGA Environmental Committee