



ENVIRONMENTAL SERVICES DEPARTMENT
AIR QUALITY DIVISION
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Technical Guidance #TG99-004

Date: September 2, 1999

Rule: 319, subsection 502.1

Subject: Evaluation of volumetric flow for cotton gins

Issue: Evaluation of volumetric flow prior to October 1999 may be difficult to achieve if the gin has not yet started operations. The cost of start up electricity at a gin can be very high for some gins and it would not be cost-effective to turn on the gin before the operation starts only to perform a test. In addition, does the October 1999 deadline refer to October 1st or anytime in October up to the 31st?

Discussion: The date of October 1999 was inserted in this rule because it was widely believed that ginning usually starts in September or October. In order to allow flexibility, the compliance date for flow evaluation was extended throughout October. It is of course important that the evaluation of volumetric flow be performed before the operation starts for the season. If a gin does not begin ginning until October or November 1999, the initial testing (evaluation of volumetric flow) may be coordinated with the start of ginning. The intent of the October date was to indicate that the initial evaluation of volumetric flow be completed for the 1999-2000 season before ginning starts. If a gin does not start ginning until after October 1999, then this initial testing requirement must be coordinated with the starting date such that the initial testing is completed prior to ginning. Gins will not be required to turn power on simply to conduct the initial testing in October 1999. However, gins not completing this test by the end of October 1999 must submit an extension request to the Control Officer.

Conclusion: Cotton gins must perform an evaluation of volumetric flow prior to resuming their cotton ginning season, regardless of the actual ginning date. The initial testing requirement does not become applicable to a gin until the gin is ready to start ginning.

signed 9/7/99

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