

AIR PERMITTING ISSUES ASSOCIATED WITH COTTON BYPRODUCT MANUFACTURING**FACILITIES****L.B. Goodrich****Mita Upadhyay****Mike Meister****Trinity Consultants****Corpus Christi, TX****Abstract**

This paper will discuss some of the air permitting issues associated with current cotton byproduct processing facilities and their typical operational parameters. In addition, the recent interest in bio-fuels, specifically biodiesel, has lead some cotton seed manufacturers to invest in biodiesel production plants that use cotton seed oil as their feed stock. Typical vegetable oil mills are major sources of hexane and are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories (also known as Maximum Achievable Control Technology [MACT] regulations), and as such, they are subject to regulation for all hazardous air pollutants HAP emitted from the site. When a biodiesel plant is collocated with an oil mill the combined sources may be categorized as a major source. This categorization will subject all emissions from the biodiesel plant to meet the more stringent NESHAP emission requirements that are significantly more burdensome for the facility to meet than otherwise would apply.