



Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**
District Facility # N-1662
Project # N-1122928

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Gallo Glass Company is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct N-1662-15-1 into the Title V operating permit. The modification consisted of the replacement of the vaporizer vessel.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-1662-15-1, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1122928

Engineer: Mark Schonhoff
Date: September 24, 2012

Facility Number: N-1662
Facility Name: Gallo Glass Company
Mailing Address: PO Box 1230
Modesto, CA 95353

Contact Name: Julia Bonardi
Phone: (209) 341-4298

Responsible Official: Joseph Majewski
Title: Sr. Director - Operations

I. PROPOSAL

Gallo glass Company is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct N-1662-15-1 into the Title V operating permit. The modification was to replace the vaporizer vessel.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

605 S. Santa Cruz Avenue
Modesto, CA

III. EQUIPMENT DESCRIPTION

17.2 MMBTU/HR CRYOQUIP MODEL VFTU-262-3I-860-2 DRIOX VAPORIZER
HEATER WITH TWO 8.6 MMBTU/HR COEN MODEL SDAF-10 LOW-NOX
BURNERS

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The facility has received an Authority to Construct permit authorizing the replacement of the vaporizer vessel.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. N-1662-15-3
- B. Authority to Construct No. N-1662-15-1
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit N-1662-15-2

ATTACHMENT A

Proposed Modified Title V Operating Permit
N-1662-15-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1662-15-3

EXPIRATION DATE: 06/30/2016

EQUIPMENT DESCRIPTION:

17.2 MMBTU/HR CRYOQUIP MODEL VFTU-262-3I-860-2 DRIOX VAPORIZER HEATER WITH TWO 8.6 MMBTU/HR COEN MODEL SDAF-10 LOW-NOX BURNERS

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. 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] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. Annual heat input of the unit shall not exceed 1.8 billion Btu per year, based on a 12-month rolling total. [District Rules 2201, 4305, 4306, and 4320]
8. If the process heater exceeds the allowable annual heat input limit, the unit must meet the applicable emission limits specified in District Rule 4320 Section 5.2 Table 1 and Section 5.4 on and after the date the annual heat input limit is exceeded. [District Rule 4320] Federally Enforceable Through Title V Permit
9. Emissions shall not exceed any of the following limits: 30 ppmvd NO_x @ 3% O₂ or 0.036 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 200 ppmvd CO @ 3% O₂ or 0.15 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
11. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The permittee shall monitor, at least on a monthly basis, the amount of water use, the amount of unit blow down, and the exhaust stack temperature or other operational characteristics recommended by the unit manufacturer. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. Records of this unit's 12-month rolling total heat input shall be maintained. These records shall be updated at least on a monthly basis. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. The facility shall submit an application to modify the Title V permit prior to commencing construction of the changes authorized by this Authority to Construct. [District Rule 2520] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authority to Construct
N-1662-15-1



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

COPY

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1662-15-1

ISSUANCE DATE: 07/23/2010

LEGAL OWNER OR OPERATOR: GALLO GLASS COMPANY

MAILING ADDRESS: PO BOX 1230
MODESTO, CA 95353

LOCATION: 605 S SANTA CRUZ AVE
MODESTO, CA 95354

EQUIPMENT DESCRIPTION:

MODIFICATION TO REPLACE THE VAPORIZER HEATER VESSEL AND REINCORPORATE RULE 4320 . POST-PROJECT EQUIPMENT DESCRIPTION IS: 17.2 MMBTU/HR CRYOQUIP MODEL VFTU-262-3I-860-2 DRIOX VAPORIZER HEATER WITH TWO 8.6 MMBTU/HR COEN MODEL SDAF-10 LOW-NOX BURNERS

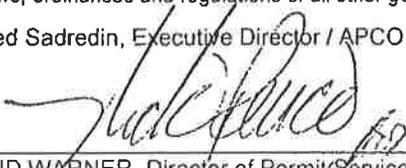
CONDITIONS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. 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] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
6. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
7. Annual heat input of the unit shall not exceed 1.8 billion Btu per year, based on a 12-month rolling total. [District Rules 2201, 4305, 4306, and 4320]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


DAVID WARNER, Director of Permit Services

N-1662-15-1 Jul 23 2010 8:23AM - DEMARISF : Joint Inspection NOT Required

8. If the process heater exceeds the allowable annual heat input limit, the unit must meet the applicable emission limits specified in District Rule 4320 Section 5.2 Table 1 and Section 5.4 on and after the date the annual heat input limit is exceeded. [District Rule 4320] Federally Enforceable Through Title V Permit
9. Emissions shall not exceed any of the following limits: 30 ppmvd NO_x @ 3% O₂ or 0.036 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 200 ppmvd CO @ 3% O₂ or 0.15 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
10. Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
11. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rules 4306 and 4320] Federally Enforceable Through Title V Permit
12. The permittee shall monitor, at least on a monthly basis, the amount of water use, the amount of unit blow down, and the exhaust stack temperature or other operational characteristics recommended by the unit manufacturer. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
13. Records of this unit's 12-month rolling total heat input shall be maintained. These records shall be updated at least on a monthly basis. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
14. Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
16. The facility shall submit an application to modify the Title V permit prior to commencing construction of the changes authorized by this Authority to Construct. [District Rule 2520] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
N-1662-15-1	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Gallo Glass Company	
2. MAILING ADDRESS: STREET/P.O. BOX: PO BOX 1230 CITY: Modesto STATE: CA 9-DIGIT ZIP CODE: 95353	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 605 South Santa Cruz Avenue CITY: Modesto ¼ SECTION TOWNSHIP RANGE	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: glass container manufacturing	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Permit N-1662-15-1 Replace like for like: Hex model VFTU 342-41860 drixo vaporizer heater with Cryoquip model VFTU 262-31-860-2 vessel. This is an equipment description change only.	
6. TYPE OR PRINT NAME OF APPLICANT: Julia Bonardi	TITLE OF APPLICANT: Environmental Specialist
7. SIGNATURE OF APPLICANT: <i>Julia Bonardi</i>	DATE: 5 Sept 12 PHONE: (209) 341.4298 FAX: (209) 341.2710 EMAIL: Julia.Bonardi@ejgallo.com

For APCD Use Only:

DATE STAMP SEP 06 2012 SJVAPCD NORTHERN REGION	FILING FEE RECEIVED: \$ 0 CHECK#: _____
	DATE PAID: _____ PROJECT NO: <u>11122928</u> FACILITY ID: <u>N-1662</u>

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Gallo Glass Company	FACILITY ID: N - 1662
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Gallo Glass Company	
3. Agent to the Owner: Joseph Majewski	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare under penalty of perjury under the laws of the state of California, that the foregoing is correct and true:

Joseph Majewski
Signature of Responsible Official

9/5/12
Date

Joseph Majewski
Name of Responsible Official (please print)
Sr. Director - Operations (Plant Manager)
Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit
N-1662-15-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1662-15-2

EXPIRATION DATE: 06/30/2016

EQUIPMENT DESCRIPTION:

17.2 MMBTU/HR HEX MODEL VFTU-342-41860 DRIOX VAPORIZER HEATER WITH TWO (2) COEN MODEL SDAF-10 LOW-NOX BURNERS (RATED AT 8.6 MMBTU/HR EACH)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. 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] Federally Enforceable Through Title V Permit
4. The unit shall only be fired on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
5. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. [District Rules 2201, 4305, 4306 and 4351] Federally Enforceable Through Title V Permit
6. The annual heat input into this unit shall be less than 9 billion Btu per calendar year. [District Rules 2201, 4305, and 4306] Federally Enforceable Through Title V Permit
7. Emissions rates from the natural gas-fired unit shall not exceed any of the following limits: 30 ppmv NO_x @ 3% O₂ or 0.036 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.012 lb-PM₁₀/MMBtu, 200 ppmv CO @ 3% O₂ or 0.15 lb-CO/MMBtu, or 0.003 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Owner/operator shall have unit tuned at least twice each calendar year, from four to eight months apart, in which it operates, by a technician that is qualified, to the satisfaction of the APCO, in accordance with the procedure described in Rule 4304 (Equipment Tuning Procedure for Boilers, Steam Generators, and Process Heaters). [District Rules 4305, 4306 and 4351] Federally Enforceable Through Title V Permit
9. If the unit does not operate throughout a continuous six-month period within a calendar year, only one tune-up is required for that calendar year. No tune-up is required for any unit that is not operated during that calendar year; this unit may be test fired to verify availability of the unit for its intended use, but once the test firing is completed the unit shall be shutdown. [District Rule 4306] Federally Enforceable Through Title V Permit
10. The permittee shall monitor, at least on a monthly basis, the amount of water use, the amount of unit blow down, and the exhaust stack temperature or other operational characteristics recommended by the unit manufacturer. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
11. Records of tune-up and monitoring of the operational characteristics of the unit shall be maintained. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by: ASTM D1826 or D1945 in conjunction with ASTM D3588 for gaseous fuels. A record of the test results shall be kept. [District Rule 4351, 6.1.1, 6.2] Federally Enforceable Through Title V Permit
13. Records of monthly and annual heat input of the unit shall be maintained. [District Rules 2201, 4305, 4306 and 4351, 40 CFR Part 60.48(g)(2)] Federally Enforceable Through Title V Permit
14. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306] Federally Enforceable Through Title V Permit

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