



OCT 16 2012

Matthew Belair
Delicato Vineyards
12001 S. Highway 99
Manteca, CA 95336

**Re: Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)
District Facility # N-266
Project # N-1120366**

Dear Mr. Belair:

Enclosed for your review is the District's analysis of your application for Authorities to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Modification of the organic material receiving storage, and mixing operation (ATC Permit N-266-640-1) and organic material open windrow composting operation (ATC Permit N-266-641-1) for compliance with Rule 4566 (Organic Material Composting Operation).

After addressing any EPA comments made during the 45-day comment period, the Authorities to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Rupl Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

DW:KC/st

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
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Central Region (Main Office)
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OCT 16 2012

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

Re: **Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)**
District Facility # N-266
Project # N-1120366

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for Delicato Vineyards, located at 12001 S. Highway 99, Manteca, CA, which has been issued a Title V permit. Delicato Vineyards is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. Modification of the organic material receiving storage, and mixing operation (ATC Permit N-266-640-1) and organic material open windrow composting operation (ATC Permit N-266-641-1) for compliance with Rule 4566 (Organic Material Composting Operation).

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authorities to Construct # N-266-640-1 and N-266-641-1 with Certificate of Conformity. After demonstrating compliance with the Authorities to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

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San Joaquin Valley Air Pollution Control District Authority to Construct

Modification of Organic Material Composting Operations for Rule 4566 Compliance

Facility Name: Delicato Vineyards Date: September 17, 2012
Mailing Address: 12001 S. Highway 99 Engineers: Kai Chan
Manteca, CA 95336 Lead Engineer: Nick Peirce
Contact Person: Matthew Belair
Telephone: (209) 824-3612
Fax: (209) 824-3612 Email: matt.belair@delicato.com
Application #(s): N-266-640-1 & N-266-641-1
Project #: N-1120366
Deemed Complete: April 25, 2012

I. PROPOSAL:

Delicato Vineyards requests an Authority to Construct (ATC) permit for modification of the organic material receiving, storage, and mixing operation (ATC Permit N-266-640-1) to include a permit condition to comply with the stockpile requirements of District Rule 4566 (Organic Material Composting Operations), Section 5.1. The facility proposes to comply with one of the following requirements within 10 days of receipt of organic materials at the facility: (a). Remove the organic material from the facility; (b). Start the active phase of composting; or (c). Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored.

The facility also requests an ATC permit for modification of the open windrow active and curing phase organic material composting operation (ATC Permit N-266-641-1) to comply with the composting requirements of Rule 4566, Section 5.2.1. The facility proposes to include permit conditions to require at least three turns during the active-phase composting process and to install an independent watering system to comply with the composting mitigation measures requirements for watering systems in Table 1 of Rule 4566.

These modifications are proposed solely to comply with District Rule 4566 requirements. Since there is a change to the method of operation of these organic material composting operations, these changes are modifications pursuant to District Rule 2201 (New and Modified Stationary Source Review Rule). In addition, the facility is not proposing any increases to the current receiving and processing rates due to this project.

See Appendix B for a copy of the current Permits To Operate (PTOs).

Delicato Vineyards is an existing major stationary source and has received their Title V permit. Per Rule 2520, Section 3.20, this proposed project constitutes a minor modification to the facility's Title V permit and may be processed with a Certificate of Conformity (COC). The facility requests that these ATC permits be issued with a COC and has submitted a Compliance Certification form (see Appendix C). Therefore, Delicato Vineyards will be required to submit a Title V administrative amendment application prior to operating under these ATC permits issued under this proposed project.

II. APPLICABLE RULES:

Rule 2201: New and Modified Stationary Source Review Rule (4/21/11)
Rule 2520: Federally Mandated Operating Permits (6/21/01)
Rule 4101: Visible Emissions (2/17/05)
Rule 4102: Nuisance (12/17/92)
Rule 4202: Particulate Matter - Emission Rate (12/17/92)
Rule 4566: Organic Material Composting Operations (8/18/11)
Rule 8011: General Requirements (8/19/04)
Rule 8031: Bulk Materials (8/19/04)
Rule 8041: Carryout and Trackout ((8/19/04)
Rule 8061: Paved and Unpaved Roads (8/19/04)
Rule 8071: Unpaved Vehicle/Equipment Traffic Areas (9/16/04)
California Health & Safety Code Section 41700 (Public Nuisance)
California Health & Safety Code Section 42301.6 (School Notice)
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. PROJECT LOCATION:

The facility is located at 12001 S. Highway 99 in Manteca, California. This project will not result in an increase in hazardous air emissions; therefore school noticing requirements of California Health and Safety Code Section 42301.6 is not required for this project.

IV. PROCESS DESCRIPTION:

Feedstock Organic Waste Material Receiving, Storage, & Mixing (ATC Permit N-266-640-1):

Delicato Vineyards primarily uses grape pomace from their wine making processes as green waste feedstock materials used for composting. The grape pomace is delivered via dump trucks from the wine-making processes and unloaded directly onto the receiving section of the staging area. The staging area is utilized to sort the pomace that will either be shipped offsite or moved to their composting storage piles. Per the applicant, the majority of the grape pomace created during the grape harvest season is shipped off-site and is not introduced into the composting operation. Grape pomace is used as an animal feed additive and has some market value. Per the applicant, approximately 90 percent of the grape pomace per year is shipped off site. The organic materials (grape pomace) that remain on-site are transferred to the open windrow composting area.

Particulate matter with an aerodynamic diameter less than or equal to 10 microns (PM_{10}) is generated from the green waste feedstock materials stockpiling and transfers due to the material drops and disturbance. Volatile Organic Compounds (VOC) and ammonia (NH_3) emissions are also generated from the decomposition of the stored green waste feedstock materials.

Open Windrow Composting (ATC Permit N-266-641-1):

Composting is the aerobic decomposition of organic materials by microorganisms under controlled conditions into a soil-like substance called compost. Windrow composting involves placing organic materials in long, narrow triangular cross section piles and turning or aerating them on a regular basis. The organic materials to be composted are transferred to the windrow composting area, where the materials are formed into windrow piles. The windrow piles are built and shaped, typically using a front-end loader, with typical dimensions of 3 to 12 feet high, 8 to 20 feet wide, and 50 to 500 feet long. For this facility, the windrow piles are 5 feet high, 5 feet wide and 450 feet long for both the active and curing phases.

The active phase of the composting process begins once the organic materials are formed into windrow piles. During this active stage, microorganisms start to break down the material and consume the most easily degradable organic matter giving off a significant amount of heat. The formed windrows are turned or aerated using a front-end loader or windrow turning machine weekly or more often depending on the middle temperature of the windrows. The windrows are turned after pathogen and weed seed destruction temperature have been reached (typically between $120^{\circ}F$ to $150^{\circ}F$), but before reaching temperatures that impede composting (typically above $160^{\circ}F$). The active composting stage will typically last three to nine weeks, depending on the type of materials and frequency of turning.

At the end of the active composting stage, most of the easily degradable organic material has been decomposed. The remaining organic material decomposes much more slowly and is the beginning of the curing phase of the composting process. The compost may be left in the windrows or moved to a larger pile where it is allowed to further decompose very slowly over a period of weeks or months, depending on the desired final quality of the product. During this phase little additional heat is generated and minimal turning is needed. The compost becomes biologically stable and the pile will gradually cool to near air temperature. Once the maturing process is complete, the compost material is applied to the vineyards after post-harvest work in the vineyards have been completed.

PM_{10} is generated due to the forming of the composting piles and from the periodic turning or aeration of the formed composting piles. VOC and NH_3 emissions are also generated from the decomposition of the organic material in the composting piles.

Operating Schedule & Process Rate:

The facility may operate up to 24 hours per day and 365 days/year at the following processing rates as provided by the applicant.

Permit Number	Maximum Processing Rates
N-266-640-1	Daily Quantity of Organic Waste Material Received for Composting: 900 wet tons/day Daily Quantity of Organic Waste Material Stockpiles: 900 wet tons/day Annual Quantity of Organic Waste Material Used for Composting: 82,000 wet tons/year
N-266-641-1	Daily Quantity of Organic Waste Placed in the Windrow Composting Piles: 900 wet tons/day Daily Quantity of Active Phase Composting Piles: 4,550 wet tons/day Daily Quantity of Curing Phase Composting Piles: 4,550 wet tons/day Annual Quantity of Active Phase Composting Piles: 82,000 wet tons/year Annual Quantity of Curing Phase Composting Piles: 82,000 wet tons/year

V. EQUIPMENT LISTING:

N-266-640-1:

Pre project Equipment Description:

FEEDSTOCK RECEIVING, STORAGE, AND MIXING OPERATION.

Post-project Equipment Description:

ORGANIC WASTE AND FEEDSTOCK MATERIAL RECEIVING, STORAGE, AND MIXING OPERATION

N-266-641-1:

Pre-Project Equipment Description:

OPEN WINDROW COMPOSTING OPERATION.

Post-Project Equipment Description:

OPEN WINDROW ACTIVE AND CURING PHASE ORGANIC MATERIAL COMPOSTING OPERATION WITH AN INDEPENDENT WATERING SYSTEM SERVING THE ACTIVE-PHASE COMPOSTING WINDROW PILES.

VI. EMISSION CONTROL TECHNOLOGY EVALUATION:

N-266-640-1:

The existing green and food waste feedstock material receiving, storage, and mixing operations will produce VOC, NH₃ and PM₁₀ emissions. Also, there is the potential for other odorous emissions. To reduce the fugitive VOC emissions from the feedstock piles, the facility has proposed to comply with the stockpile requirements of Rule 4566, Section 5.1.1. The facility has proposed within 10 days of receipt of organic material at the facility to comply with one of the following: (a). Remove the organic material form the facility; (b). Start the active phase of composting; or (c). Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored. By removing, processing, or covering the feedstock piles within 10 days of receipt of the material, the VOC emissions will be reduced when compared to the previous processing time.

A water sprinkler system will continue to be used, as needed, to control the fugitive dust (PM₁₀) emissions during the receiving, handling, loading, and mixing of the feedstock materials. On site haul roads will be kept adequately moist to reduce fugitive dust emissions with the use of a water truck.

N-266-641-1:

The existing windrow composting operations will produce VOC, NH₃ and PM₁₀ emissions. Also, there is the potential for other odorous emissions. To reduce VOC emissions from the active-phase composting windrows the facility is proposing to comply with composting requirements of Rule 4566, Section 5.2.1.1. The facility will now implement at least three turns of the windrow piles during the active-phase process and install an independent watering system that complies with the composting mitigation measures outlined in Table 1 of Rule 4566. As determined by from the San Joaquin Valley Air Pollution Study Agency's field study the use of a watering system will provide a 19% reduction in VOC emissions during the active phase composting process.

A water sprinkler system will continue to be used, as needed, to control the fugitive dust (PM₁₀) emissions during the handling and turning of the window piles. Fugitive dust (PM₁₀) emissions from the windrows will be controlled by the high moisture content of the composting material (typically 40% to 65%) and by facility water trucks when required. On site haul roads will be kept adequately moist to reduce fugitive dust emissions with the use of a water truck.

VII. GENERAL CALCULATIONS:

A. Assumptions:

N-266-640-1:

1. PM₁₀ will be emitted from the receiving, handling, and mixing of the green and incidental food waste feedstock organic materials.
2. VOC and NH₃ will be emitted from the storage of the green and incidental food waste feedstock organic materials.
3. PM₁₀ control efficiency of at least 70%⁽¹⁾ for handling of high moisture content material (25%) with wet spray dust suppression.
4. Proposed maximum stockpile storage time of 10 days.
5. For feedstock organic materials receiving and transfer to storage there will be a total of 3 drop points consisting of the following: (a). 1-drop point from the receiving of the material; (b). 2-drop points from the transfer of the material from the receiving area to the storage pile.
6. For feedstock organic materials mixing there will be a total of 2 drop points consisting of the repeated lifting and dropping of the materials with a front-end loader.

¹ Per AP-42, Table B.2-3 (AIRS Code 061), the average control efficiency for dust suppression with water spray is 70% for particulate matter with an aerodynamic diameter smaller than or equal to 10 microns (PM₁₀).

N-266-641-1:

1. VOC and NH₃ will be emitted from the active phase and curing phase windrows.
2. PM₁₀ will only be emitted during the forming of the active phase windrow piles. PM₁₀ emissions during the turning of the active phase windrows and forming of the curing phase windrows are assumed to be negligible due to high moisture content of materials handled (moisture content is typically 40% to 65%).
3. For the forming of the windrow composting piles there will be a total of 2 drop points consisting of the transfer of the mixed compost materials from the mixing pile to the windrow pile.
4. VOC emissions from at least three turns of the windrow piles and use of an independent watering system all during the active-phase composting period will reduce the VOC emissions by 19%.

B. Emission Factors (EF):

N-4912-7-1 & N-4912-8-1:

Pre & Post-Project Emission Factor (EF1 & EF2):

For these operations the pre and post project emission factors will not change due to this proposed project. Therefore, the EF2 will be equal to the EF1 as listed in the table below:

Pre & Post-Project Emission Factors (EF1 & EF2)		
Pollutant (Emission Source)	EF1 & EF2	Source
PM ₁₀ (Receiving, Mixing, & Storage)	0.00033 (lb-PM ₁₀ /wet ton)	Project #: C-1101871
VOC (Stockpiles)	1.063 (lb-VOC/wet ton/day)	District Green Waste Compost Emission Factor Report (9/15/10)
NH ₃ (Stockpiles)	0.318 (lb-NH ₃ /wet ton/day)	District Green Waste Compost Emission Factor Report (9/15/10)
VOC (Active Phase Windrows)	0.086 (lb-VOC/wet ton/day)	District Green Waste Compost Emission Factor Report (9/15/10)
	5.14 (lb-VOC/wet ton)	
VOC (Curing Phase Windrows)	0.0095 (lb-VOC/wet ton/day)	District Green Waste Compost Emission Factor Report (9/15/10)
	0.57 (lb-VOC/wet ton)	
NH ₃ (Active Phase Windrows)	0.017 (lb-NH ₃ /wet ton/day)	District Green Waste Compost Emission Factor Report (9/15/10)
	0.997 (lb-NH ₃ /wet ton)	
NH ₃ (Curing Phase Windrows)	0.0019 (lb-NH ₃ /wet ton/day)	District Green Waste Compost Emission Factor Report (9/15/10)
	0.111 (lb-NH ₃ /wet ton)	

C. Potential to Emit (PE) Calculations:

1. Pre-Project Potential to Emit (PE1):

Pre-project daily emission (Daily PE1) calculations are only required to determine if Best Available Control Technology (BACT) is triggered for the emission units modified under this project. As determined below in Section VII.D.2. (AIPE) of this

document, this project is exemption from BACT. Therefore, the daily PE1 calculations are not necessary and will not be performed for this project. Pre-project annual emissions (Annual PE1) will be calculated to determine the Quarterly Net Emissions Change (QNEC) to complete the District's PAS emissions profile screen.

Annual PE1 Calculations:

N-266-640-0:

PM₁₀, VOC, and NH₃ Emissions from Material Receiving, Handling, Mixing, and Storage of the Organic Waste Materials:

The annual PE1 emissions will be calculated utilizing the emission factors as stated in Section VII.B. and based on the following as provided by the applicant:

Maximum Stockpile Storage Time: 10 days

Annual Material Receiving/Mixing/Storage Rate: 82,000 wet tons/year

Total Drop Points = 3 Drop Points (Receiving) + 2 Drop Points (Mixing)
= 5 Drop Points (Total)

Annual PE1_{PM10-Receiving/Mixing} = 5 Drop Points × Receiving/Mixing Rate (wet ton/year)
× EF1_{PM10/Receiving/Transfer} (lb-PM₁₀/wet ton)

Annual PE1_{VOC} = Annual Storage Weight (wet ton/year)
× Stockpile Storage Time (days) × EF1_{VOC/Stockpiles} (lb/wet ton/day)

Annual PE1_{NH3} = Annual Storage Weight (wet ton/year)
× Stockpile Storage Time (days) × EF1_{NH3/Stockpiles} (lb/wet ton/day)

Annual PE1 for Permit N-266-640-0				
Pollutant	Drop Points	Receiving/Mixing Rate	EF1	Annual PE1
PM ₁₀	5 drop points (Receiving/Mixing)	82,000 wet tons/year	0.00033 lb-PM ₁₀ /wet ton	135 lb/year
Pollutant	Storage Days	Storage Weight	EF1	Annual PE1
VOC	10 storage days	82,000 wet tons/year	1.063 lb-VOC/wet ton/day	871,660 lb/year
NH ₃	10 storage days	82,000 wet tons/year	0.318 lb-NH ₃ /wet ton/day	260,760 lb/year

N-266-641-0:

PM₁₀, VOC, and NH₃ Emissions from the Windrow Composting Piles:

The annual PE1 emissions will be calculated utilizing the emission factors as stated in Section VII.B. and based on the following as provided by the applicant:

Annual Material Transfer Rate: 82,000 wet tons/year

Annual Composting Weight: 82,000 wet tons/year

$$\text{Annual PE1}_{\text{PM}_{10}} = \# \text{ of Drop Points} \times \text{Annual Transfer Rate (wet ton/year)} \\ \times \text{EF1}_{\text{PM}_{10}/\text{Transfer}} \text{ (lb-PM}_{10}/\text{ton)}$$

$$\text{Annual PE1}_{\text{VOC/Windrow Active-Phase}} = \text{Annual Composting Weight (wet ton/year)} \\ \times \text{EF1}_{\text{VOC/Windrow Active Phase}} \text{ (lb/wet ton)}$$

$$\text{Annual PE1}_{\text{VOC/Windrow Curing-Phase}} = \text{Annual Composting Weight (wet ton/year)} \\ \times \text{EF1}_{\text{VOC/Windrow Curing Phase}} \text{ (lb/wet ton)}$$

$$\text{Annual PE1}_{\text{NH}_3/\text{Windrow Active-Phase}} = \text{Annual Composting Weight (wet ton/year)} \\ \times \text{EF1}_{\text{NH}_3/\text{Windrows Active-Phase}} \text{ (lb/wet ton)}$$

$$\text{Annual PE2}_{\text{NH}_3/\text{Windrow Curing-Phase}} = \text{Annual Composting Weight (wet ton/year)} \\ \times \text{EF1}_{\text{NH}_3/\text{Windrows Curing-Phase}} \text{ (lb/wet ton)}$$

Annual PE1 for Permit N-266-641-0				
Pollutant	Drop Points	Transfer Rate	EF1	Annual PE1
PM ₁₀	2	82,000 wet tons/year	0.00033 lb-PM ₁₀ /wet ton	54 lb/year

Annual PE1 for Permit N-266-641-0			
Pollutant	Composting Weight	EF1	Annual PE1
VOC (Active-Phase)	82,000 wet tons/year	5.14 lb-VOC/wet ton	421,480 lb/year
VOC (Curing Phase)	82,000 wet tons/year	0.57 lb-VOC/wet ton	46,740 lb/year
Combined Annual VOC			468,220 lb/year
Pollutant	Composting Weight	EF1	Annual PE1
NH ₃ (Active-Phase)	82,000 wet tons/year	0.997 lb-NH ₃ /wet ton	81,754 lb/year
NH ₃ (Curing-Phase)	82,000 wet tons/year	0.111 lb-NH ₃ /wet ton	9,102 lb/year
Combined Annual NH₃			90,856 lb/year

2. Post-Project Potential to Emit (PE2):

Daily and Annual PE2 Calculations:

N-266-640-1:

PM₁₀, VOC, and NH₃ Emissions from Material Receiving, Handling, Mixing, and Storage of the Organic Waste Materials:

The daily PM₁₀, VOC, and NH₃ emissions will be calculated as follows based on the following as proposed by the applicant:

Maximum Stockpile Storage Time: 10 days
 Daily Material Receiving/Mixing Rate: 900 wet tons/day
 Daily Stockpile Storage Weight: 900 wet tons/day
 Annual Material Receiving/Mixing/Storage Rate: 82,000 wet tons/year

Total Drop Points = 3 Drop Points (Receiving) + 2 Drop Points (Mixing)
 = 5 Drop Points (Total)

Daily PE2_{PM10-Receiving/Mixing} = 5 Drop Points × Receiving/Mixing Rate (wet ton/day)
 × EF2_{PM10/Receiving & Mixing} (lb-PM₁₀/wet ton)

Annual PE2_{PM10-Receiving/Mixing} = 5 Drop Points × Receiving/Mixing Rate (wet ton/year)
 × EF2_{PM10/Receiving/Transfer} (lb-PM₁₀/wet ton)

Daily PE2_{VOC} = Daily Storage Weight (wet ton/day) × Stockpile Storage Time (days)
 × EF2_{VOC/Stockpiles} (lb/wet ton/day)

Annual PE2_{VOC} = Annual Storage Weight (wet ton/year)
 × Stockpile Storage Time (days) × EF2_{VOC/Stockpiles} (lb/wet ton/day)

Daily PE2_{NH3} = Daily Storage Weight (wet ton/day) × Stockpile Storage Time (days)
 × EF2_{NH3/Stockpiles} (lb/wet ton/day)

Annual PE2_{NH3} = Annual Storage Weight (wet ton/year)
 × Stockpile Storage Time (days) × EF2_{NH3/Stockpiles} (lb/wet ton/day)

Daily and Annual PE2 for ATC Permit N-266-640-1				
Pollutant	Drop Points	Receiving/Mixing Rate	EF2	Daily & Annual PE2
PM ₁₀	5 drop points (Receiving/Mixing)	900 wet tons/day	0.00033 lb-PM ₁₀ /wet ton	1.5 lb/day
PM ₁₀	5 drop points (Receiving/Mixing)	82,000 wet tons/year	0.00033 lb-PM ₁₀ /wet ton	135 lb/year
Pollutant	Storage Days	Storage Weight	EF2	Daily & Annual PE2
VOC	10 storage days	900 wet tons/day	1.063 lb-VOC/wet ton/day	9,567.0 lb/day
VOC	10 storage days	82,000 wet tons/year	1.063 lb-VOC/wet ton/day	871,660 lb/year
NH ₃	10 storage days	900 wet tons/day	0.318 lb-NH ₃ /wet ton/day	2,862.0 lb/day
NH ₃	10 storage days	82,000 wet tons/year	0.318 lb-NH ₃ /wet ton/day	260,760 lb/year

N-266-641-1:

PM₁₀, VOC, and NH₃ Emissions from the Windrow Composting Piles:

The active phase composting process will be controlled with the use of an independent watering system with three windrow turns which will reduce the VOC emissions by 19%. The daily PM₁₀, VOC, and NH₃ emissions will be calculated as follows based on the following:

Daily Material Transfer Rate: 900 wet tons/day
Annual Material Transfer Rate: 82,000 wet tons/year
Daily Active-Phase Composting Weight: 4,550 wet tons
Daily Curing-Phase Composting Weight: 4,550 wet tons
Annual Composting Weight: 82,000 wet tons/year
Mitigation Measure Control Efficiency (CE): 19%

$$\text{Daily PE}_{2\text{PM}_{10}} = \# \text{ of Drop Points} \times \text{Daily Transfer Rate (wet ton/day)} \\ \times \text{EF}_{2\text{PM}_{10}/\text{Transfer}} \text{ (lb-PM}_{10}\text{/wet ton)}$$

$$\text{Annual PE}_{2\text{PM}_{10}} = \# \text{ of Drop Points} \times \text{Annual Transfer Rate (wet ton/year)} \\ \times \text{EF}_{2\text{PM}_{10}/\text{Transfer}} \text{ (lb-PM}_{10}\text{/ton)}$$

$$\text{Daily PE}_{2\text{VOC}/\text{Windrow Active-Phase}} = \text{Daily Active-Phase Composting Weight (wet ton)} \times \\ \text{EF}_{2\text{Daily VOC}/\text{Windrows Active-Phase}} \text{ (lb/wet ton/day)} \\ \times (1 - \text{CE})$$

$$\text{Annual PE}_{2\text{VOC}/\text{Windrow Active-Phase}} = \text{Annual Composting Weight (wet ton/year)} \\ \times \text{EF}_{2\text{VOC}/\text{Windrow Active Phase}} \text{ (lb/wet ton)} \\ \times (1 - \text{CE})$$

$$\text{Daily PE}_{2\text{VOC}/\text{Windrow Curing-Phase}} = \text{Curing-Phase Composting Weight (wet ton)} \\ \times \text{EF}_{2\text{Daily VOC}/\text{Windrows Curing-Phase}} \text{ (lb/wet ton/day)}$$

$$\text{Annual PE}_{2\text{VOC}/\text{Windrow Curing-Phase}} = \text{Annual Composting Weight (wet ton/year)} \\ \times \text{EF}_{2\text{VOC}/\text{Windrow Curing Phase}} \text{ (lb/wet ton)}$$

$$\text{Daily PE}_{\text{NH}_3/\text{Windrow Active-Phase}} = \text{Daily Active-Phase Composting Weight (wet ton)} \\ \times \text{EF}_{2\text{Daily NH}_3/\text{Windrows Active-Phase}} \text{ (lb/wet ton/day)} \\ \times (1 - \text{CE})$$

$$\text{Annual PE}_{2\text{NH}_3/\text{Windrow Active-Phase}} = \text{Annual Composting Weight (wet ton/year)} \\ \times \text{EF}_{\text{NH}_3/\text{Windrows Active-Phase}} \text{ (lb/wet ton)} \\ \times (1 - \text{CE})$$

$$\text{Daily PE}_{2\text{NH}_3/\text{Windrow Curing-Phase}} = \text{Daily Curing-Phase Composting Weight (wet ton)} \\ \times \text{EF}_{2\text{Daily NH}_3/\text{Windrows Curing-Phase}} \text{ (lb/wet ton/day)}$$

$$\text{Annual PE}_{2\text{NH}_3/\text{Windrow Curing-Phase}} = \text{Annual Composting Weight (wet ton/year)} \\ \times \text{EF}_{2\text{NH}_3/\text{Windrows Curing-Phase}} \text{ (lb/wet ton)}$$

Daily and Annual PE2 for ATC Permit N-266-641-1				
Pollutant	Drop Points	Transfer Rate	EF2	Daily & Annual PE2
PM ₁₀	2	900 wet tons/day	0.00033 lb-PM ₁₀ /wet ton	0.6 lb/day
PM ₁₀	2	82,000 wet tons/year	0.00033 lb-PM ₁₀ /wet ton	54 lb/year
Pollutant	Control Efficiency (CE)	Composting Weight	EF2	Daily PE2
VOC (Active-Phase)	0.19	4,550 wet tons	0.086 lb-VOC/wet ton/day	317.0 lb/day
VOC (Curing-Phase)	0	4,550 wet tons	0.0095 lb-VOC/wet ton/day	43.2 lb/day
Combined Daily VOC				360.2 lb/day
Pollutant	Control Efficiency (CE)	Composting Weight	EF2	Annual PE2
VOC (Active-Phase)	0.19	82,000 wet tons/year	5.14 lb-VOC/wet ton	341,399 lb/year
VOC (Curing Phase)	0	82,000 wet tons/year	0.57 lb-VOC/wet ton	46,740 lb/year
Combined Annual VOC				388,139 lb/year
Pollutant	Control Efficiency (CE)	Composting Weight	EF2	Daily PE2
NH ₃ (Active-Phase)	0	4,550 wet tons	0.017 lb-NH ₃ /wet ton/day	77.4 lb/day
NH ₃ (Curing-Phase)	0	4,550 wet tons	0.0019 lb-NH ₃ /wet ton/day	8.6 lb/day
Combined Daily NH₃				86.0 lb/day
Pollutant	Control Efficiency (CE)	Composting Weight	EF2	Annual PE2
NH ₃ (Active-Phase)	0	82,000 wet tons/year	0.997 lb-NH ₃ /wet ton	81,754 lb/year
NH ₃ (Curing-Phase)	0	82,000 wet tons/year	0.111 lb-NH ₃ /wet ton	9,102 lb/year
Combined Annual NH₃				90,856 lb/year

D. Increase in Permitted Emissions (IPE):

1. Quarterly Net Emissions Change (QNEC):

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emission profile for each permit unit. It is assumed that each unit's annual emission changes are evenly distributed throughout the year. Therefore, for the proposed modifications:

$$\text{QNEC (lb/qtr)} = [\text{Annual PE2 (lb/year)} - \text{Annual PE1 (lb/year)}] \div 4 \text{ Quarters/year}$$

QNEC for ATC Permit N-266-640-1			
Pollutant	Annual PE2 (lb/year)	Annual PE1 (lb/year)	QNEC (lb/qtr)
PM ₁₀	135	135	00.00
VOC	871,660	871,660	00,000.00

QNEC for ATC Permit N-266-641-1			
Pollutant	Annual PE2 (lb/year)	Annual PE1 (lb/year)	QNEC (lb/qtr)
PM ₁₀	54	54	00.00
VOC	388,139	468,220	-20,020.25

2. Adjusted Increase in Permitted Emissions (AIPE)

N-266-640-1 & N-266-641-1

The AIPE is used to determine if BACT is required for emission units that are being modified. Section 4.2.3 provides an exemption from the Best Available Control Technology (BACT) requirements of District Rule 2201 for projects involving the installation of an emission control technique solely for the purpose of compliance with District Rules. As discussed in Section VIII. (Compliance) of this document, the proposed modification is exempt from BACT requirements and AIPE calculations are not necessary.

E. Facility Emissions:

1. Pre-Project Stationary Source Potential to Emit (SSPE1):

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

SSPE1 (lb/year) ⁽²⁾						
Permit No.	NOx	CO	VOC	SOx	PM ₁₀	NH ₃
N-266-1-2	0	0	863	0	0	0
N-266-3-1	69	9	1	0	1	0
N-266-8-2 to '-10-2, '-14-2 to '-49-2, '-56-2 to '-106-2, '-113-2 to '-502-2, '-569-0 to '-639-0, '-643-0 to '-676-0, & '-678-0 to '-741-0	0	0	394,298	0	0	0
N-266-503-2 (ATC Permit)	511	1,679	183	146	365	0

² Unless otherwise noted, the pre-project annual emissions from the permit units at this facility were obtained from Project #N-1112357.

N-266-640-0 ⁽³⁾	0	0	871,660	0	135	260,760
N-266-641-0 ⁽³⁾	0	0	468,220	0	54	90,856
N-266-642-0 ⁽⁴⁾	0	0	0	0	54	0
Total Annual PE1	580	1,688	1,735,225	146	609	351,616
ERC	0	0	0	0	0	0
Total SSPE1	580	1,688	1,735,225	146	609	351,616

2. Post-Project Stationary Source Potential to Emit (SSPE2):

Pursuant to Section 4.10 of District Rule 2201, the Post-Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

SSPE2 (lb/year)						
Permit No.	NOx	CO	VOC	SOx	PM ₁₀	NH ₃
N-266-1-2	0	0	863	0	0	0
N-266-3-1	69	9	1	0	1	0
N-266-8-2 to '-10-2, '-14-2 to '-49-2, '-56-2 to '-106-2, '-113-2 to '-502-2, '-569-0 to '-639-0, '-643-0 to '-676-0, & '-678-0 to '-741-0	0	0	394,298	0	0	0
N-266-503-2 (ATC Permit)	511	1,679	183	146	365	0
N-266-640-1 (ATC Permit)	0	0	871,660	0	135	260,760
N-266-641-1 (ATC Permit)	0	0	388,139	0	54	90,856
N-266-642-0	0	0	0	0	54	0
Total Annual PE2	580	1,688	1,655,144	146	609	351,616
ERC	0	0	0	0	0	0
Total SSPE2	580	1,688	1,655,144	146	609	351,616

3. Major Source Determination

Pursuant to Section 3.24 of District Rule 2201, a Major Source is a stationary source with post-project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. However, Section 3.23.2 states, "for the purposes of determining major source status, the SSPE2 shall not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site." There are no ERCs listed for this facility.

³ Emissions for these permit units were revised and obtained from Section VII.C.1 of this document.

⁴ Based on the revised annual processing rate limit of 82,000 wet tons/year as determined under this project, the annual PE for this unit is: Annual PE_{PM10} = 2 drop points × 82,000 wet tons/year × 0.00033 lb-PM₁₀/wet-ton/drop point = 54 lb-PM₁₀/year

The emissions from composting operations are fugitive as defined in Section 3.19 of District Rule 2201 and are not listed as a non-exempt fugitive source in 40 CFR 70.2 (Definitions). Therefore, the VOC emissions from the composting operations under permits N-266-640-1, and -641-1 are not included in the determination of a major source as defined in District Rule 2201, Section 3.24, and have been subtracted from the Major Source Determination SSPE2 total as indicated in the table below.

Major Source Determination (lb/year)					
	NOx	CO	VOC	SOx	PM₁₀
SSPE2	580	1,688	1,655,144	146	609
N-266-640-1	0	0	-871,660	0	0
N-266-641-1	0	0	-388,139	0	0
Major Source Determination SSPE2	580	1,688	395,345	146	609
Major Source Threshold	20,000	200,000	20,000	140,000	140,000
Major Source	NO	NO	YES	NO	NO

4. Baseline Emissions (BE):

The BE calculation (in lb/year) is performed on a pollutant-by-pollutant basis to determine the amount of offsets required, where necessary, when the SSPE1 is greater than the offset threshold. As determine in Section VIII. of this document regarding Rule 2201, this project is exempt from offsets pursuant to Rule 2201, Section 4.6.8. Therefore, BE calculations are not required.

5. Stationary Source Project Increase in Permitted Emissions (SSIPE)

SSIPE is used to determine if a project triggers public notification (Ref. District Rule 2201, Section 5.4.5). For the proposed project SSIPE is calculated as follows:

$$\text{SSIPE (for any one pollutant)} = \text{SSPE2} - \text{SSPE1}$$

Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)
NOx	580	580	0
CO	1,688	1,688	0
VOC	1,655,144	1,735,225	0 ⁽⁵⁾ (-80,081)
SOx	146	146	0
PM ₁₀	609	609	0

F. SB-288 Major Modification:

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

⁵ Per District practice, calculated negative values for SSIPE are set equal to zero.

Since the emissions from this project are only due to fugitive emissions from the composting operations, which are not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the SB 288 Major Modification calculation. Therefore this project is not an SB 288 Major Modification and no further discussion is required.

G. Federal Major Modification:

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since the emissions from this project are only due to fugitive emissions from the composting operations, which are not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Federal Major Modification determination. Therefore this project is not a Federal Major Modification and no further discussion is required.

VIII. COMPLIANCE

Rule 2201 – New and Modified Stationary Source Review Rule:

A. Best Available Control Technology (BACT):

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless exempted pursuant to Section 4.2, BACT is required for the following actions: (1) Any new emissions unit with a potential to emit exceeding 2.0 pounds in any one day, (2) The relocation of an existing emissions unit from one stationary source to another with a potential to emit exceeding 2.0 pounds in any one day, (3) Modifications to an existing emissions unit with a valid Permit to Operate resulting in an Adjusted Increase in Permitted Emissions (AIPE) exceeding 2.0 pounds in any one day, and (4) Any new or modified emissions unit, in a stationary source project, which results in an SB-288 Major modification or Federal Major Modification, as defined in this rule. If the post project Stationary Source Potential to Emit (SSPE2) for Carbon Monoxide is less than 200,000 pounds per year, BACT is not required for Carbon Monoxide.

However, BACT shall not be required for the following:

4.2.3 For existing facilities, the installation or modification of an emission control technique performed solely for the purpose of compliance with the requirements of District, State or Federal air pollution control laws, regulations, or orders, as approved by the APCO, shall be exempt from Best Available Control Technology for all air pollutants, provided all of the following conditions are met:

4.2.3.1 There shall be no increase in the physical or operational design of the existing facility, except for those changes to the design needed for the installation or modification of the emission control technique itself;

4.2.3.2 There shall be no increase in the permitted rating or permitted operating schedule of the permitted unit;

- 4.2.3.3 There shall be no increase in emissions from the stationary source that will cause or contribute to any violation of a National Ambient Air Quality Standard, Prevention of Significant Deterioration increment, or Air Quality Related Value in Class I areas; and
- 4.2.3.4 The project shall not result in an increase in permitted emissions or potential to emit of more than 25 tons per year of NO_x, or 25 tons per year of VOC, or 15 tons per year of SO_x, or 15 tons per year of PM₁₀, or 50 tons per year of CO.
- 4.2.3.5 The project shall not constitute a Federal Major Modification.

N-266-640-1:

The proposed modification to the organic waste and feedstock material receiving, storage, and mixing operation is solely for compliance with District Rule 4566 requirements and will only result in the facility processing, removing, or covering the feedstock piles within 10 days of receiving the organic waste materials. The modification does not result in an increase in the physical or operational design or permitted limits of this operation. There is also no increase in permitted emissions for any affected pollutant. As determined in Section VII.G. of this document the proposed project does not constitute a Federal Major Modification. Therefore, the emission units under this operation are exempt from BACT requirements.

N-266-641-1:

The proposed modification to the open windrow active and curing phase organic material composting operation is also solely for compliance with District Rule 4566 requirements and will only result in the facility turning the active-phase windrows three turns during processing and to install an independent watering system for VOC control. The modification does not result in an increase in the physical or operational design or permitted limits of this operation. There is also no increase in permitted emissions for any affected pollutant. As determined in Section VII.G. of this document the proposed project does not constitute a Federal Major Modification. Therefore, the emission units under this operation are exempt from BACT requirements.

B. Offsets:

Offset Applicability:

The proposed modifications are solely for compliance with Rule 4566, and are exempt from offsets if the following criteria are satisfied. Rule 2201, Section 4.6.8 provides the following exemption from offsets.

Emission offsets shall not be required for the following:

- 4.6.8 For existing facilities, the installation or modification of an emission control technique performed solely for the purpose of compliance with the requirements of District, State or Federal air pollution control laws, regulations, or orders, as approved by the APCO, shall be exempt from offset requirements for all air pollutants provided all of the following conditions are met:
- 4.6.8.1 There shall be no increase in the physical or operational design of the existing facility, except for those changes to the design needed for the installation or modification of the emission control technique itself;
 - 4.6.8.2 There shall be no increase in the permitted rating or permitted operating schedule of the permitted unit;
 - 4.6.8.3 There shall be no increase in emissions from the stationary source that will cause or contribute to any violation of a National Ambient Air Quality Standard, Prevention of Significant Deterioration increment, or Air Quality Related Value in Class I areas; and
 - 4.6.8.4 The project shall not result in an increase in permitted emissions or potential to emit of more than 25 tons per year of NO_x, or 25 tons per year of VOC, or 15 tons per year of SO_x, or 15 tons per year of PM-10, or 50 tons per year of CO.

N-266-640-1 & N-266-641-1:

As determined above, the proposed modifications are solely for compliance with District Rule 4566 requirements. The modifications do not result in an increase in the physical or operational design or permitted limits of these operations. There are no increases in permitted emissions for any affected pollutant. Therefore, offsets are not required.

C. Public Notification:

1. Applicability

District Rule 2201, section 5.4, requires a public notification for the affected pollutants from the following types of projects:

- New Major Sources
- SB-288 and Federal Major Modifications
- New emission units with a PE > 100 lb/day of any one pollutant
- Modifications with SSPE1 below an offset threshold and SSPE2 above an offset threshold on a pollutant by pollutant basis
(Existing Facility Offset Threshold Exceedance Notification)
- New stationary sources with SSPE2 exceeding offset thresholds
(New Facility Offset Threshold Exceedance Notification)
- Any permitting action with a SSIPE exceeding 20,000 lb/yea0r for any one pollutant. (SSIPE Notice)

a. New Major Source Notice Determination:

A New Major Source is a new facility, which is also a major source. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

b. SB-288 and Federal Major Modification Notice Determination:

As determined in Section VII.F. and G. of this document, this project does not trigger SB-288 or Federal Major Modification. Therefore, public notice is not required for SB-288 or Federal Major Modification purposes.

c. PE Notification:

As indicated in Section VII.C.2.A. (Daily PE2 Calculations) above, the proposed project will not result in the installation of new emission units with an increase in emissions of greater than 100 lb/day for any pollutant. Therefore, public noticing will be not required for PE > 100 lb/day purposes.

d. Existing Facility - Offset Threshold Notification

Existing facilities with the SSPE1 below the offset threshold resulting in an SSPE2 exceeding the offset threshold due to the proposed project for one or more pollutants will require public noticing.

Pollutant	Offset Thresholds (lb/year)	SSPE1 (lb/year)	SSPE2 (lb/year)	Public Notice Required?
NOx	20,000	580	580	No
CO	200,000	1,688	1,688	No
VOC	20,000	1,735,225	1,655,144	No
PM ₁₀	29,200	609	609	No
SOx	54,750	146	146	No

As shown in the table above, the SSPE1 is above the offset threshold for VOC prior to this project. Therefore, public noticing is not required for offset threshold exceedance purposes.

e. New Facility - Offset Threshold Notification

This is an existing facility. This section does not require a public notification.

f. SSIPE Notification:

A notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. As shown in section VII.E.5. of this document, the SSIPE will not exceed 20,000 lb/year for any criteria pollutant as a result of this project. Therefore, public noticing will not be required for SSIPE exceeding 20,000 lb/year.

2. Public Notice Action

Rule 2201, Section 5.5 details the actions taken by the District when public noticing is triggered according to the application types above. As indicated above the public noticing requirements is not triggered for this project. Therefore, public notification and publication requirements as indicated in section 5.5 of this rule are **not required**.

D. Daily Emission Limits:

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.16 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.16.1 and 3.16.2, the DEL must be contained in the latest Authority to Construct (ATC) permit and contained in or enforced by the latest Permit to Operate (PTO) and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

N-266-640-1:

Currently permit N-266-640-0 contain a daily permit limit of 12,500 cubic yards (equivalent to 10,000 wet tons) of feedstock, compost, or chipped and ground materials on-site at any one time, which was based on their existing San Joaquin County Environmental Health Department Enforcement Agency Notification (SWIS #39-AA-0037). This limit will now be replaced with the following District DELs, which are equivalent and more enforceable, in a practicable manner, on a daily basis.

The DELs for the organic waste material receiving, storage, and mixing operations will be based on the maximum quantity of material received along with the emission rate in pounds emitted per wet ton of material received and processed. The following permit conditions will be included on the ATC permit and PTO to enforce the requirements of this section:

- *The quantity of organic waste materials received at this facility shall not exceed 900 wet tons in any single day and 82,000 wet tons in any one calendar year. For the purposes of this permit, organic waste material is considered to be green waste, food waste, and untreated construction wood waste. [District Rules 2201 and 4566]*
- *PM₁₀ emissions from the receiving, handling, and mixing of the organic waste materials shall not exceed 0.00167 lb-PM₁₀/wet-ton⁽⁶⁾ of material received and processed. [District Rule 2201]*
- *VOC emissions from the storage and processing of the organic waste materials shall not exceed 10.63 lb-VOC/wet ton⁽⁷⁾ of material stored and processed. [District Rule 2201]*
- *NH₃ emissions from the storage and processing of the organic waste materials shall not exceed 3.18 lb-NH₃/wet ton⁽⁸⁾ of material stored and processed. [District Rule 2201]*

⁶ PM10 Emission Rate = 1.5 lb-PM10/day ÷ 900 wet-tons/day = 0.00167 lb-PM10/wet-tons

⁷ VOC Emission Rate = 9,567.0 lb-VOC/day ÷ 900 wet-tons/day = 10.63 lb-VOC/wet-tons

N-266-641-1:

Since the daily VOC emissions from the organic waste composting operations are daily average values based on a typical 60 day composting life cycle, the DELs for this permit will be based on the calculated daily emissions as determined in Section VII (General Calculations) of this document. In addition, the emissions will also be limited by the maximum quantity of material received for composting, which is limited by the conditions in permit N-266-640-1. The following permit conditions will be placed on the ATC permit and PTO to enforce the requirements of this section:

- *PM10 emissions from the organic material composting operation shall not exceed 0.6 pounds in any single day. Compliance with this condition shall be demonstrated using the following equation: $PM10 \text{ Emissions (lb/day)} = 0.00066 \text{ lb-PM10/wet-ton} \times \text{Total daily quantity of material transferred from the feedstock piles to active-phase composting windrows (in wet-tons/day)}$. [District Rule 2201]*
- *VOC emissions from the organic material composting operation shall not exceed 360.2 pounds in any single day. Compliance with this condition shall be demonstrated using the following equation: $VOC \text{ Emissions (lb/day)} = 0.06966 \text{ lb-VOC/wet-ton} \times \text{Total daily quantity of active phase composting piles utilized onsite (in wet-tons/day)} + 0.0095 \text{ lb-VOC/wet-tons} \times \text{Total daily quantity of curing phase composting piles utilized onsite (in wet-tons/day)}$. [District Rule 2201]*
- *NH₃ emissions from the organic material composting operation shall not exceed 86.0 pounds in any single day. Compliance with this condition shall be demonstrated using the following equation: $NH_3 \text{ Emissions (lb/day)} = 0.017 \text{ lb-NH}_3\text{/wet-tons} \times \text{Total daily quantity of active phase composting piles utilized onsite (in wet tons/day)} + 0.0019 \text{ lb-NH}_3\text{/wet-tons} \times \text{Total daily quantity of curing phase composting piles utilized onsite (in wet-tons/day)}$. [District Rule 2201]*

E. Compliance Assurance

The following measures shall be taken to ensure continued compliance with District Rules.

1. Source Testing

N-266-640-1 & N-266-641-1:

These operations will not be utilizing control equipment, which requires source testing by District Policy APR 1705 (Source Testing Frequency). Therefore, source testing for these operations will not be required.

2. Monitoring

N-266-640-1 & N-266-641-1:

There are no monitoring requirements for these modified operations.

³ NH₃ Emission Rate = 2,862.0 lb-NH₃/day ÷ 900 wet-tons/day = 3.18 lb-NH₃/wet-tons

3. Record Keeping

N-266-640-1 & N-266-641-1:

Per District Rule 4566 (Organic Material Composting Operations), these operations are subject to recordkeeping requirements. Refer to Section VIII under Rule 4566 for a discussion of the recordkeeping requirements.

4. Reporting

N-266-640-1 & N-266-641-1:

There are no reporting requirements for these modified operations.

Rule 2520 - Federally Mandated Operating Permits

N-266-640-1 & N-266-641-1:

This facility was issued their Title V Operating Permit. The proposed project constitutes a **Minor** Modification to the Title V Permit pursuant to Section 3.20 of this Rule. The applicant has proposed to receive the ATC permits with Certificates of Conformity in accordance with the requirements of 40 CFR 70.6(c), 70.7 and 70.8. Therefore, the 45-day EPA notice will be conducted prior to the issuance of the ATC permits.

In accordance with Rule 2520, the application meets the procedural requirements of Section 11.4 by including:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs and
- The source's suggested draft permits (Appendix A of this document) and
- Certification by a responsible official that the proposed modification meets the criteria for use of major permit modification procedures and a request that such procedures be used (Appendix C of this document).

Per section 5.3.2 of this rule, the applicant must submit an application for a Title V permit modification prior to implementing the requested changes. The following federally enforceable conditions will be placed on each of these ATC permits to ensure compliance with this rule:

- *{1830} This Authority to Construct serves as a written Certificate of Conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2520] Y*
- *{1831} Prior to operating with the modifications authorized by this Authority to Construct, the facility shall submit an application for an administrative amendment to its Title V permit, in accordance with District Rule 2520, Section 11.4.2. [District Rule 2520] Y*

Compliance with this rule is expected.

Rule 4101 - Visible Emissions

N-266-640-1 & N-266-641-1:

District Rule 4101, Section 5.0, indicates that 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 dark or darker than Ringelmann 1 or equivalent to 20% opacity. Opacity is expected to be less than 20% provided that these operations are properly performed. The following conditions will be listed on each permit:

- {15} 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]
- All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity. [District Rule 4101]

Compliance is expected with this Rule.

Rule 4102 – Nuisance

N-266-640-1 & N-266-641-1:

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected provided that these operations are properly performed. The following condition will be placed on each permit:

- {98} No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]

Compliance is expected with this Rule.

California Health & Safety Code 41700 (Health Risk Assessment)

The District's Risk Management Policy for Permitting New and Modified Sources (APR 1905, 3/2/01) requires that a risk management review be performed for all projects that result in any increases in emissions of hazardous air pollutants. This project is to modify existing permits with no increase in hazardous air pollutants. Therefore, a risk management review is not required.

Rule 4202 - Particulate Matter – Emission Rate

The purpose of this rule is to limit particulate matter emissions by establishing allowable emission rates. The maximum allowable emissions rate is calculated using the following formulas:

$$E_{Max} = 3.59 P^{0.62}$$

where: E = Emissions in lb/hr

P = Process weight in ton/hr ($P \leq 30$ tons/hr)

or

$$E_{\text{Max.}} = 17.31 P^{0.16}$$

where: E = Emissions in lb/hr

P = Process weight in ton/hr (P > 30 tons/hr)

Permit Number	P (ton/hr)	E _{Proposed} (lb-PM/hr)	E _{Max.} (lb/hr)
N-266-640-1 ⁽⁹⁾	37.5	0.063	30.9
N-266-641-1 ⁽¹⁰⁾	37.5	0.025	30.9

Since the proposed PM Emission rates are less than the allowable maximum emission rates, these permit units are expected to operate in compliance with this rule.

Rule 4566 – Organic Material Composting Operations

N-266-640-1 & N-266-641-1:

Sections 1.0 (Purpose) and 2.0 (Applicability):

The purpose of this rule is to limit the emissions volatile organic compounds (VOC) from composting operations. Per Section 2.0, this rule applies to composting facilities that compost and/or stockpile organic material.

This facility will stockpile and compost green, food, and untreated construction wood waste organic materials. Therefore, the facility's stockpiling operation (Permit Unit N-266-640) and composting operation (Permit Unit N-266-641) are subject to the requirements of this rule.

Section 5.1 (Stockpile Requirements):

Section 5.1.1 requires operators of a composting operation with a total annual throughput of < 100,000 wet tons per year of organic material shall comply with one of the following within 10-days of receipt of the organic material at the facility:

- 5.1.1.1 Remove the organic material from the facility;
- 5.1.1.2 Start the active phase of composting;
- 5.1.1.3 Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored; or
- 5.1.1.4 Implement an APCO approved alternative mitigation measure, not listed above.

⁹ For this permit unit the maximum process rate is 37.5 tons/hr based on a receiving rate of 900 wet-tons/day and operating 24 hrs/day. The E_{Proposed} is 0.063 lb/hr based on an emission rate of 1.5 lb/day and operating 24 hrs/day.

¹⁰ For this permit unit the maximum process rate is 37.5 tons/hr based on a processing rate of 900 wet-tons/day and operating 24 hrs/day. The E_{Proposed} is 0.025 lb/hr based on an emission rate of 0.6 lb/day and operating 24 hrs/day.

To comply with the requirements of Section 5.1, the facility proposes to perform one of the following within 10 days of receiving organic materials at the facility: (a). Remove the organic material; (b). Start the active phase of composting; or (c). Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored. The following condition will be included in ATC permit N-266-640-1 to assure compliance with the requirements of this section:

- *The operator shall perform one of the following to organic material within 10 days of receipt at the facility to satisfy the stockpile requirements: (a). Remove the organic material from the facility; (b). Place the organic material in the active-phase composting windrow and start active phase composting; (c). Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored. [District Rule 4566]*

Section 5.2 (Composting Requirements):

Section 5.2.1 requires an operator of a composting operation with a total throughput of < 200,000 wet tons per year of organic material shall comply with Section 5.2.1.1 or Section 5.2.1.2 during the active phase of composting.

5.2.1.1 For windrow composting only, implement at least three turns during the active-phase and one of the mitigation measures for the Watering System in Table 1.

5.2.1.2 Implement an APCO and EPA approved alternative mitigation measure that demonstrates at least a 19% reduction (by weight) in VOC emissions.

To comply with the requirements of this section of the rule, the facility is proposing the following mitigation measures as indicated in Table 1 below:

Table 1 – Composting Facility Mitigation Measures		
Watering Systems		Facility Proposed
1.	<p>Independent Watering System:</p> <p>a. Apply water to the surface area of each windrow prior to turning. Test each windrow within three hours before turning for adequate water by taking a sample of the compostable material from between the vertical midpoint and the peak of the windrow, at least three inches below the outer surface. For the ball test, form the material into a ball using hand pressure. There should be at least enough water to form a ball when compressed by hand, but the ball may break when tapped.</p> <p>b. If the ball crumbles during the hand pressure test, apply additional water to the windrow prior to turning until the material passes the ball test, as described in Section 1.a.</p>	[X]
2.	<p>Integrated Watering System:</p> <p>a. For windrows that will be turned on the same day and will require the same water volume, mechanically turn the first windrow while operating the integrated watering system. Within three hours after turning the first windrow, take a sample of the compostable material from between the vertical midpoint and the peak of the windrow, at</p>	[]

	<p>least three inches below the outer surface. For the ball test, form the material into a ball using hand pressure. There should be at least enough water to form a ball when compressed by hand, but the ball may break when tapped.</p> <p>b. If the ball crumbles during the hand pressure test, apply additional water and mechanically turn the same windrow, then retest until the material passes the ball test. Subsequent windrows shall not be turned until the initial windrow passes the ball test. Utilize the established water volume for the remaining windrows to be turned with the same water volume on the same day. Repeat the method in Section 2.a. for windrows that will be turned with a different water application rate.</p>	
<ul style="list-style-type: none"> • For either the independent or integrated watering systems, if a rain event occurs prior to turning the windrow, take a sample of the compostable material from between the vertical midpoint and the peak of the windrow within three hours before turning and at least three inches below the outer surface. Form the material into a ball using hand pressure. There should be at least enough water to form a ball when compressed by hand, but the ball may break when tapped. • If the ball crumbles during the hand pressure test, apply additional water to the windrow prior to turning until the material passes the ball test. 		[X]
Finished Compost Cover		Facility Proposed
<p>An operator shall cover the surface area of at least the top third of each windrow with finished compost cover so that there is at least six inches in height of finished compost cover as measured at the peak of each windrow. An operator shall cover the surface area of each windrow as described within three hours of initial windrow formation and within three hours after each turning of the windrow for at least three turns of each windrow. For any windrow that are mechanically turned after 2:00 PM, an exception to the three hour limit can be made, which allows the operator to cover the surface area of at least the top third of each windrow with finished compost cover by 12:00 PM the following day.</p>		[]

The facility is proposing to comply with Section 5.2.1.1 along with the use of an independent watering system. The following condition will be included in ATC permit N-266-640-1 to assure compliance with the requirements of this section:

- *The operator shall implement at least three turns of each organic waste material composting windrow during the active-phase of the composting process. [District Rule 4566]*
- *The operator shall install, maintain, and utilize an independent watering system to apply water to the surface of each active-phase composting windrow prior to turning. The operator shall test each windrow within three hours before turning for adequate water by taking a sample of the organic material in the windrow and passing a "Ball Test". The "Ball Test" is performed by taking a sample of the compostable material from at least three inches below the surface, between the vertical midpoint and the peak of the windrow and forming the sample into a ball using hand pressure. There should be at least enough water in the material to form a ball when compressed by*

hand, but the ball may break when tapped. If the material cannot form a ball or crumbles during the ball test, then application of additional water to the windrow prior to turning is required until the material passes the ball test. If a rain event occurs prior to turning the windrow, application of additional water to the surface of the windrow will not be required if the material passes the ball test as previously described. [District Rule 4566]

Section 6.0 (Administrative Requirements)

Facility Emission Mitigation Plan (FEMP):

Section 6.1 requires an operator to submit a Facility Emission Mitigation Plan (FEMP) along with an Authority to Construct (ATC) application, in accordance with Rule 2010 (Permits Required), to incorporate the approved mitigation measures from the facility's FEMP as applicable permit conditions. The operator has satisfied these requirements with the submission of their FEMP along with the ATC permit applications for this project.

Recordkeeping:

Section 6.3.2 requires an operator subject to this rule to maintain an operations log. The operations log shall include the following information on a daily basis: (a). The date the organic material arrives on site; (b). The type of organic material received on site; and (c). The weight (in wet tons) of each type of organic material received on site.

Section 6.3.3 requires an operator of a composting facility subject to the stockpile requirements to maintain an operations log, which includes the following information on a daily basis: (a). The date of which each stockpile was initially formed; (b). The date and action taken on each stockpile to satisfy the stockpile requirements; and (c). Other information necessary to determine compliance with the requirements.

The following permit condition will be included in ATC permit N-266-640-1 to assure compliance with the recordkeeping requirements of Sections 6.3.2 and 6.3.3:

- *A daily operations log shall be maintained and shall include the following:*
 - (a). The date, type, and weight (in wet tons) of each organic material received;*
 - (b). The date each stockpile was initially formed;*
 - (c). The date and action taken on each stockpile to satisfy the stockpile requirements;*
 - (d). Total quantity and type of each organic material stored for composting (in wet tons);*
 - (e). Total quantity and type of each organic material mixed for composing (in wet tons);*
 - (f). Any other information necessary to demonstrate compliance with Rule 4566.*
- [District Rules 1070 & 4566]*

Section 6.3.4.1 requires an operator of a composting facility subject to the composting requirements for a watering system to maintain an operations log, which includes the following information on a daily basis: (a). Record the date and time the organic material from the windrow was tested for compliance; (b). Indicate whether the windrow passes the ball test and, if applicable, all corrective actions taken; (c). Record the date and time the windrow was turned; (d). Record other information necessary to determine compliance with the requirements.

The following permit condition will be included in ATC permit N-266-641-1 to assure compliance with the recordkeeping requirements of Section 6.3.4.1:

- *A daily operations log shall be maintained and shall include the following:*
 - (a). The date and time the organic material from the windrow was tested for adequate water content using the "ball test" and indicate if the material passed the ball test. If the windrow material did not pass the ball test indicate the corrective actions taken;*
 - (b). The date and time each windrow was turned;*
 - (c). Total quantity of organic material transferred from the stockpiles to the active-phase composting windrows (in wet tons);*
 - (d). Total quantity of active-phase composting windrows (in wet tons);*
 - (e). Total quantity of curing-phase composting windrows (in wet tons);*
 - (f). Any other information necessary to demonstrate compliance with Rule 4566.**[District Rules 1070 & 4566]*

Section 6.3.5 requires an operator to retain all applicable records, as specified in the recordkeeping requirements of Section 6.0, on site for a period of five years and the records shall be made available to the APCO upon request. The following permit condition will be included in ATC permits N-266-640-1 and '-641-1 to assure compliance with the requirements of Section 6.3.5:

- *{Modified 3246} All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request.*
[District Rules 1070 & 4566]

Section 7.0 (Compliance Schedule)

Section 7.1 requires operators of a composting facility subject to the composting operation requirements of this rule to submit a complete Facility Emission Mitigation Plan (FEMP) and Authority-to-Construct (ATC) application that complies with all applicable requirements of this rule by the dates indicated in Table 2 of this rule.

For operators proposing to comply with the watering system requirements the compliance date is February 18, 2012. This facility has satisfied this requirement with the submission of their completed FEMP and ATC permit applications under this project.

Section 7.2.1 requires operators of a composting operation subject to the stockpile requirements shall be in full compliance with all stockpile requirements on and after August 18, 2012. The following permit condition will be included in ATC permit N-266-640-1 to assure compliance with the compliance schedule requirements of Section 7.2.1:

- *The facility shall be in full compliance with all applicable stockpile requirements of District Rule 4566 on and after August 18, 2012. [District Rule 4566]*

Section 7.3.1 requires an operator of a composting operation with a total throughput of less than 200,000 wet tons per year of organic material to be in full compliance with the applicable Watering System requirements of Section 5.2.1 by August 18, 2012. The following permit condition will be included in ATC permit N-266-641-1 to assure compliance with the compliance schedule requirements of Section 7.3.1:

- *The facility shall be in full compliance with all applicable composting requirements of District Rule 4566 for a Watering System on and after August 18, 2012. [District Rule 4566]*

Conclusion:

Conditions will be incorporated into these ATC permits in order to ensure compliance with each section of this rule. Therefore, compliance with District Rule 4566 requirements is expected.

Rule 8011 - General Requirements

The definitions, exemptions, requirements, administrative requirements, record keeping requirements, and test methods set forth in this rule are applicable to all rules under Regulation VIII (Fugitive PM₁₀ Prohibitions) of the Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District.

Rule 8031 - Bulk Materials

Pursuant to Section 2.0, this Rule is applicable to the outdoor handling and storage of any bulk material, which emits visible dust when stored or handled. The following condition will be included on each ATC and PTO to ensure compliance with the requirements of this rule.

- *All bulk material transport vehicles shall limit Visible Dust Emissions to 20% opacity by either limiting vehicular speed, maintaining sufficient freeboard on the load, applying water to the top of the load, or covering the load with a tarp or other suitable cover. [District Rules 8011 and 8031]*

Rule 8041 - Carryout and Trackout

Pursuant to Section 2.0, this Rule is applicable to all sites that are subject to Rule 8021 (Construction, Demolition, Excavation, Extraction, and other Earthmoving Activities), Rule 8031 (Bulk Materials), and Rule 8071 (Unpaved Vehicle and Equipment Traffic Areas) where carryout or trackout has occurred or may occur. The following condition will be included on each ATC and PTO to ensure compliance with the requirements of this Rule:

- *An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 or Rule 8011. [District Rule 8041]*

Rule 8061 - Paved and Unpaved Roads

Pursuant to Section 2.0, this Rule applies to any paved, or unpaved public or private road, street, highway, freeway, alley, way, access drive, access easement, or driveway constructed or modified after December 10, 1993. The following condition will be included on each ATC and PTO to ensure compliance with the requirements of this Rule.

- *Any new or existing public or private paved or unpaved road, road construction project, or road modification project shall implement the control measures and design criteria of, and comply with the requirements of District Rule 8061 (Paved and Unpaved Roads), unless specifically exempted under section 4.0 of Rule 8061. [District Rule 8061]*

Rule 8071 - Unpaved Vehicle/Equipment Traffic Areas

Pursuant to Section 2.0, this Rule applies to any unpaved vehicle/equipment traffic area of 1.0 acre or larger. The following conditions will be included on each ATC and PTO to ensure compliance with the requirements of this Rule.

- *Water, gravel, roadmix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure shall be applied to unpaved vehicle travel areas as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011]*
- *On each day that 50 or more Vehicle Daily Trips or 25 or more Vehicle Daily Trips with 3 axles or more will occur on an unpaved vehicle/equipment traffic area, the permittee shall apply water, gravel, road mix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011]*

- *Whenever any portion of the site becomes inactive, the permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in District Rule 8011. [District Rules 8071 and 8011]*

California Health & Safety Code 42301.6 (School Notice)

N-266-640-1 & N-266-641-1:

The facility is proposing to modified these permit units, which will not result in an increase in hazardous air emissions; therefore school noticing requirements of California Health and Safety Code Section 42301.6 is not required for this project.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission units are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District concludes that potential health impacts are less than significant.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

To ensure that issuance of these permits does not conflict with any conditions imposed by any local agency permit processes, the following permit condition will be listed on each ATC permit as follows:

- *This permit does not authorize the facility to operate without the required permits from other local, state or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [District Rules 2070 and 2080, and Public Resources Code 21000-21177: California Environmental Quality Act].*

IX. RECOMMENDATION

Compliance with all applicable rules and regulations is expected. Issue Authority to Construct (ATC) permits N-266-640-1 and N-266-641-1 subject to the permit conditions on the attached draft Authority to Construct permits in Appendix A.

X. BILLING INFORMATION

Permit Number	Fee Schedule	Fee Description	Previous Fee Schedule
N-266-640-1	3020-06	Miscellaneous	3020-06
N-266-641-1	3020-06	Miscellaneous	3020-06

XI. APPENDICES

- Appendix A: Draft Authority to Construct (ATC) Permits N-266-640-1 & N-266-641-1.
- Appendix B: Current Permits to Operate (PTOs) N-266-640-0 & N-266-641-0.
- Appendix C: Title V Modification – Compliance Certification Form

APPENDIX A

Draft ATC Permits N-266-640-1 & N-266-641-1

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: N-266-640-1

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: DELICATO VINEYARDS
MAILING ADDRESS: 12001 S HIGHWAY 99
MANTECA, CA 95336

LOCATION: 12001 S HIGHWAY 99
MANTECA, CA 95336

EQUIPMENT DESCRIPTION:

MODIFICATION OF THE ORGANIC WASTE AND FEEDSTOCK MATERIAL RECEIVING, STORAGE AND MIXING OPERATION TO INCLUDE PERMIT CONDITIONS FOR COMPLIANCE WITH DISTRICT RULE 4566.

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] 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. {15} 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]
5. All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity. [District Rule 4101]

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-266-640-1, Oct 15 2012 9:20AM - CHANK : Joint Inspection NOT Required

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6. The permittee is allowed to receive the following wastes for the composting operation: green waste, food waste, and construction wood waste. Green waste is defined as any organic waste material generated from gardening, agriculture, or landscaping activities including, but not limited to grass clippings, leave, tree and shrub trimmings, and plant remains. Food waste is defined as table scraps, vegetable and fruit peelings, meat, bones and fish, egg shells, solid dairy products, coffee grounds, bread and toast, paper waste including, but not limited to, napkins, towels, plates, coffee filters, and tea bags. Construction wood waste is defined as any untreated wood materials, including but not limited to, lumber, paper, and cardboard from construction. [District Rule 2010]
7. The permittee is prohibited to receive the following wastes for the composting operation: biosolids, animal manure, and poultry litter. Biosolids is defined as organic material resulting from the treatment of sewage sludge or wastewater. Animal manure is defined as non-human animal excretions and waste, including, but not limited to, dried solids and urine from cows, cattle, or swine. Poultry litter is defined as poultry excretions and waste, including, but not limited to, dried solids and urine from chickens, turkeys, geese, or ducks. [District Rule 2010]
8. The quantity of organic waste materials received at this facility shall not exceed 900 wet-tons in any single day and 82,000 wet tons in any one calendar year. For the purposes of this permit, organic waste material is considered to be green waste, food waste, and construction wood waste. [District Rules 2201 and 4566]
9. PM10 emissions from the receiving, handling, and mixing of the organic waste materials shall not exceed 0.00167 lb-PM10/wet-ton of material received and processed. [District Rule 2201]
10. VOC emissions from the storage and processing of the organic waste materials shall not exceed 10.63 lb-VOC/wet-ton of material stored and processed. [District Rule 2201]
11. NH3 emissions from the storage and processing of the organic waste materials shall not exceed 3.18 lb-NH3/wet-ton of material stored and processed. [District Rule 2201]
12. The operator shall perform one of the following to organic materials within 10 days of receipt at the facility to satisfy the stockpile requirements: (a). Remove the organic material from the facility; (b). Place the organic material in the active-phase composting windrow and start active phase composting; (c). Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored. [District Rule 4566]
13. A daily operations log shall be maintained and shall include the following: (a) The date, type, and weight (in wet tons) of each organic material received; (b). The date each stockpile was initially formed; (c). The date and action taken on each stockpile to satisfy the stockpile requirements; (d). Total quantity and type of each organic waste material stored for composting (in wet tons); (e). Total quantity and type of each organic waste material mixed for composting (in wet tons); and (f). Any other information necessary to demonstrate compliance with Rule 4566. [District Rules 1070 & 4566]
14. A cumulative annual log shall be maintained and shall indicate the total quantity and type of each organic waste material received (in wet tons). The records shall be updated at least monthly. [District Rule 1070]
15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 & 4566]
16. The facility shall be in full compliance with all applicable stockpile requirements of District Rule 4566 on and after August 18, 2012. [District Rule 4566]
17. All bulk material transport vehicles shall limit Visible Dust Emissions to 20% opacity by either limiting vehicular speed, maintaining sufficient freeboard on the load, applying water to the top of the load, or covering the load with a tarp or other suitable cover. [District Rules 8011 and 8031]
18. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 or Rule 8011. [District Rule 8041]
19. Any new or existing public or private paved or unpaved road, road construction project, or road modification project shall be implement the control measures and design criteria of, and comply with the requirements of District Rule 8061 (Paved and Unpaved Roads), unless specifically exempted under Section 4.0 of Rule 8061. [District Rule 8061]

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CONDITIONS CONTINUE ON NEXT PAGE

20. Water, gravel, roadmix or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District approved control measure shall be applied to unpaved vehicle travel areas as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8011 and 8071]
21. On each day that 50 or more Vehicle Daily Trips or 25 or more Vehicle Daily Trips with 3 axles or more will occur on an unpaved vehicle/equipment traffic area, the permittee shall apply water, gravel, road mix or chemical/organic dust stabilizers/suppressants, vegetative materials or other District approved control measure as required to limit Visible Dust Emissions to 20% opacity and comply with requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8011 and 8071]
22. Whenever any portion of the site becomes inactive, the permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in District Rule 8011. [District Rules 8011 and 8071]
23. This permit does not authorize the facility to operate without the required permits from other local, state or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state or federal agency. [District Rules 2070 and 2080, and Public Resources Code 21000-21177: California Environmental Quality Act]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-266-641-1

LEGAL OWNER OR OPERATOR: DELICATO VINEYARDS
MAILING ADDRESS: 12001 S HIGHWAY 99
MANTECA, CA 95336

LOCATION: 12001 S HIGHWAY 99
MANTECA, CA 95336

EQUIPMENT DESCRIPTION:

MODIFICATION OF THE OPEN WINDROW ACTIVE AND CURING PHASE ORGANIC MATERIAL COMPOSTING OPERATION TO INCLUDE PERMIT CONDITIONS AND INSTALL AN INDEPENDENT WATERING SYSTEM FOR COMPLIANCE WITH DISTRICT RULE 4566.

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] 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. {15} 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]
5. All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity. [District Rule 4101]
6. PM10 emissions from the organic material composting operation shall not exceed 0.6 pounds in any single day. Compliance with this condition shall be demonstrated using the following equation: $PM10 \text{ Emissions (lb/day)} = 0.00066 \text{ lb-PM10/wet-ton} \times \text{Total daily quantity of material transferred from the feedstock piles to active-phase composting windrows (in wet-tons/day)}$. [District Rule 2201]

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:266-041-1 : Oct 15 2012 9:23AM - CHANK : Joint Inspection NOT Required

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7. VOC emissions from the organic material composting operation shall not exceed 360.2 pounds in any single day. Compliance with this condition shall be demonstrated using the following equation: $\text{VOC Emissions (lb/day)} = 0.06966 \text{ lb-VOC/wet-ton} \times \text{Total daily quantity of active phase composting piles utilized onsite (in wet-tons/day)} + 0.0095 \text{ lb-VOC/wet-ton} \times \text{Total quantity of curing phase composting piles utilized onsite (in wet-tons/day)}$. [District Rule 2201]
8. NH₃ emissions from the organic material composting operation shall not exceed 86.0 pounds in any single day. Compliance with this condition shall be demonstrated using the following equation: $\text{NH}_3 \text{ Emissions (lb/day)} = 0.017 \text{ lb-NH}_3/\text{wet-ton} \times \text{Total daily quantity of active phase composting piles utilized onsite (in wet-tons/day)} + 0.0019 \text{ lb-NH}_3/\text{wet-ton} \times \text{Total daily quantity of curing phase composting piles utilized onsite (in wet-tons/day)}$. [District Rule 2201]
9. The total quantity of organic materials composted shall not exceed 82,000 wet tons in any one calendar year. [District Rules 2201 & 4566]
10. The operator shall implement at least three turns of each organic material composting windrow during the active-phase of the composting process. [District Rule 4566]
11. The operator shall install, maintain, and utilize an independent watering system to apply water to the surface of each active-phase composting windrow prior to turning. The operator shall test each windrow within three hours before turning for adequate water by taking a sample of the organic material in the windrow and passing a "Ball Test". The "Ball Test" is performed by taking a sample of the compostable material from at least three inches below the surface, between the vertical midpoint and the peak of the windrow and forming the sample into a ball using hand pressure. There should be at least enough water in the material to form a ball when compressed by hand, but the ball may break when tapped. If the material cannot form a ball or crumbles during the ball test, then application of additional water to the windrow prior to turning is required until the material passes the ball test. If a rain event occurs prior to turning the windrow, application of additional water to the surface of the windrow will not be required if the material passes the ball test as previously described. [District Rule 4566]
12. A daily operations log shall be maintained and shall include the following: (a). The date and time the organic material from the windrow was tested for adequate water content using the "Ball Test" and indicate if the material passed the ball test. If the windrow material did not pass the ball test indicate the corrective action taken; (b). The date and time each windrow was turned; (c). Total quantity of organic material transferred from the feedstock piles to the active-phase composting windrows (in wet tons); (d). Total quantity of active phase composting piles utilized onsite (in wet tons); (e). Total quantity of curing phase composting piles utilized onsite (in wet tons); and (f). Any other information necessary to demonstrate compliance with Rule 4566. [District Rules 1070 & 4566]
13. A cumulative annual log shall be maintained and shall include the following: (a). Total quantity of active-phase composting piles utilized onsite (in wet tons); (b). Total quantity of curing phase composting piles utilized onsite (in wet tons). The records shall be updated at least monthly. [District Rule 1070]
14. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 & 4566]
15. The facility shall be in full compliance with all applicable composting requirements of District Rule 4566 for a Watering System on and after August 18, 2012. [District Rule 4566]
16. All bulk material transport vehicles shall limit Visible Dust Emissions to 20% opacity by either limiting vehicular speed, maintaining sufficient freeboard on the load, applying water to the top of the load, or covering the load with a tarp or other suitable cover. [District Rules 8011 and 8031]
17. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of rule 8041 or Rule 8011. [District Rule 8041]
18. Any new or existing public or private paved or unpaved road, road construction project, or road modification project shall implement the control measures and design criteria of, and comply with the requirements of District Rule 8061 (Paved and Unpaved Roads), unless specifically exempted under section 4.0 of Rule 8061. [District Rule 8061]

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CONDITIONS CONTINUE ON NEXT PAGE

19. Water, gravel, roadmix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure shall be applied to unpaved vehicle travel areas as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011]
20. On each day that 50 or more Vehicle Daily Trips or 25 or more Vehicle Daily Trips with 3 axles or more will occur on an unpaved vehicle/equipment traffic area, the permittee shall apply water, gravel, roadmix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011]
21. Whenever any portion of the site becomes inactive, the permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in District Rule 8011. [District Rules 8071 and 8011]
22. This permit does not authorize the facility to operate without the required permits from other local, state or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state or federal agency. [District Rules 2070 and 2080, and Public Resources Code 21000-21177: California Environmental Quality Act]

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APPENDIX B

Current PTOs N-266-640-0 & N-266-641-0

San Joaquin Valley
Air Pollution Control District

In-house PERMIT TO OPERATE

PERMIT NO: N-266-640-0

ISSUANCE DATE: 01/23/2012

LEGAL OWNER OR OPERATOR: DELICATO VINEYARDS
MAILING ADDRESS: 12001 S HIGHWAY 99
MANTECA, CA 95336

LOCATION: 12001 S HIGHWAY 99
MANTECA, CA 95336

EQUIPMENT DESCRIPTION:
FEEDSTOCK RECEIVING, STORAGE AND MIXING OPERATION.

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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]
3. All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity. [District Rule 4101]
4. The permittee is allowed to receive the following wastes for the composting operation: green waste, residential food waste and construction wood waste. Green waste is defined as any organic waste material generated from gardening, agriculture, or landscaping activities including, but not limited to grass clippings, leave, tree and shrub trimmings, and plant remains. Residential food waste is defined as table scraps, vegetable and fruit peelings, meat, bones and fish, egg shells, solid dairy products, coffee grounds, bread and toast, paper waste including, but not limited to, napkins, towels, plates, coffee filters and tea bags. Construction wood waste is defined as any untreated wood materials, including but not limited to, lumber, paper, and cardboard from construction. [District Rule 2010]
5. The permittee is prohibited to receive the following wastes for the composting operation: biosolids, animal manure, and poultry litter. Biosolids is defined as organic material resulting from the treatment of sewage sludge or wastewater. Animal manure is defined as non-human animal excretions and waste, including, but not limited to, dried solids and urine from cows, cattle, or swine. Poultry litter is defined as poultry excretions and waste, including, but not limited to, dried solids and urine from chickens, turkeys, geese, or ducks. [District Rule 2010]
6. The green materials composting operation shall not exceed 12,500 cubic yards (equivalent to 10,000 wet tons) of feed stock, compost or chipped and ground materials on-site at any one time (based on the Enforcement Agency Notification under Solid Waste Facility Permit SWIS#: 39-AA-0037 and Notification Tier Permit [NTP]). [District Rule 2010]
7. A daily log shall be maintained and shall include the following: (a) Total quantity of grape pomace received (in wet tons); and (b) Total quantity of materials mixed for composting (in wet tons). [District Rule 1070]

CONDITIONS CONTINUE ON NEXT PAGE

THIS IS AN INTERNAL DISTRICT DOCUMENT ONLY. Forward a copy to the Compliance Division and file the original in the premises files. A final Permit can only be issued upon verification of compliance with all applicable local, state, and federal regulations by the Compliance Division. Upon verification of compliance, a recommendation to issue the Permit to Operate will be forwarded to the Permit Services Division by the Compliance Division staff.

N-266-040-0: Apr 17 2012 8:47AM - CRUIZF - Joint Inspection NOT Required

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8. A cumulative annual log shall be maintained and shall indicate the total quantity of grape pomace. A separate cumulative annual log shall be maintained and shall indicate the total quantity of grape pomace received (in wet tons). The records shall be updated at least monthly. [District Rule 1070]
9. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
10. All bulk material transport vehicles shall limit Visible Dust Emissions to 20% opacity by either limiting vehicular speed, maintaining sufficient freeboard on the load, applying water to the top of the load, or covering the load with a tarp or other suitable cover. [District Rules 8011 and 8031]
11. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 or Rule 8011. [District Rule 8041]
12. Any open area having 3.0 acres, or more, of disturbed surface area that has remained undeveloped, unoccupied, unused or vacant for more than seven days shall comply with the requirements of District Rule 8051 (Open Areas), unless specifically exempted under Section 4.0 [District Rule 8051]
13. Any new or existing public or private paved or unpaved road, road construction project, or road modification project shall implement the control measures and design criteria of, and comply with the requirements of District Rule 8061 (Paved and Unpaved Roads), unless specifically exempted under Section 4.0 of Rule 8061. [District Rule 8061]
14. Water, gravel, roadmix or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District approved control measure shall be applied to unpaved vehicle travel areas as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8011 and 8071]
15. On each day that 50 or more Vehicle Daily Trips or 25 or more Vehicle Daily Trips with 3 axles or more will occur on an unpaved vehicle/equipment traffic area, the permittee shall apply water, gravel, road mix or chemical/organic dust stabilizers/suppressants, vegetative materials or other District approved control measure as required to limit Visible Dust Emissions to 20% opacity and comply with requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8011 and 8071]
16. Whenever any portion of the site becomes inactive, the permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in District Rule 8011. [District Rules 8011 and 8071]
17. This permit does not authorize the facility to operate without the required permits from other local, state or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state or federal agency. [District Rules 2070 and 2080]

San Joaquin Valley
Air Pollution Control District

In-house PERMIT TO OPERATE

PERMIT NO: N-266-641-0

ISSUANCE DATE: 01/23/2012

LEGAL OWNER OR OPERATOR: DELICATO VINEYARDS
MAILING ADDRESS: 12001 S HIGHWAY 99
MANTECA, CA 95336

LOCATION: 12001 S HIGHWAY 99
MANTECA, CA 95336

EQUIPMENT DESCRIPTION:
OPEN WINDROW COMPOSTING OPERATION.

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
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 I or 20% opacity. [District Rule 4101]
3. All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity. [District Rule 4101]
4. A daily log shall be maintained and shall include the following: (a). Total quantity of green waste transferred from receiving and storage piles to active phase composting piles (in wet tons); (b). Total quantity of active phase composting piles utilized onsite (in wet tons); (c). Total quantity of curing phase composting piles utilized onsite (in wet tons). [District Rule 1070]
5. A cumulative annual log shall be maintained and shall include the following: (a). Total quantity of active phase composting piles utilized onsite (in wet tons); (b). Total quantity of curing phase composting piles utilized onsite (in wet tons). The records shall be updated at least monthly. [District Rule 1070]
6. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
7. All bulk material transport vehicles shall limit Visible Dust Emissions to 20% opacity by either limiting vehicular speed, maintaining sufficient freeboard on the load, applying water to the top of the load, or covering the load with a tarp or other suitable cover. [District Rules 8011 and 8031]
8. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of rule 8041 or Rule 8011. [District Rule 8041]
9. Any open area having 3.0 acres or more of disturbed surface area, that has remained undeveloped, unoccupied, unused or vacant for more than seven days shall comply with the requirements of District Rule 8051 (Open Area), unless specifically exempted under section 4.0. [District Rule 8051]

CONDITIONS CONTINUE ON NEXT PAGE

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N-266-641-0: Apr 17 2012 8:48AM - CRUZP Joint Inspection NOT Required

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10. Any new or existing public or private paved or unpaved road, road construction project, or road modification project shall implement the control measures and design criteria of, and comply with the requirements of District Rule 8061 (Paved and Unpaved Roads), unless specifically exempted under section 4.0 of Rule 8061. [District Rule 8061]
11. Water, gravel, roadmix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure shall be applied to unpaved vehicle travel areas as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011]
12. On each day that 50 or more Vehicle Daily Trips or 25 or more Vehicle Daily Trips with 3 axles or more will occur on an unpaved vehicle/equipment traffic area, the permittee shall apply water, gravel, roadmix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011]
13. Whenever any portion of the site becomes inactive, the permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in District Rule 8011. [District Rules 8071 and 8011]
14. This permit does not authorize the facility to operate without the required permits from other local, state, or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [District Rules 2070 and 2080]

APPENDIX C

Title V Modification Compliance Certification Form

**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
 MINOR PERMIT MODIFICATION

ADMINISTRATIVE
AMENDMENT

COMPANY NAME: <u>Delicato Family Vineyards</u>	FACILITY ID: <u>N - 266</u>
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: <u>Delicato Family COB Chris T. Delicato</u>	
3. Agent to the Owner: <u>Matthew Belair</u>	

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 forgoing is correct and true:


Signature of Responsible Official

4/24/12
Date

Matthew Belair
Name of Responsible Official (please print)

Director of Technical Ops.
Title of Responsible Official (please print)