

JAN 9 2013

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

Re: **Notice of Minor Title V Permit Modification**
District Facility # N-2321
Project # N-1120999

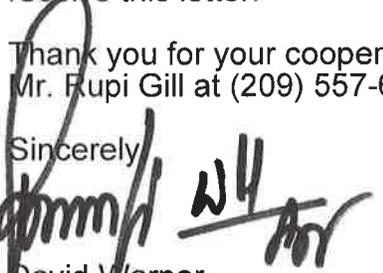
Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. CBUS OPS Inc (dba Woodbridge Winery) is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct N-2321-10-7 into the Title V operating permit. The proposed project was to modify permit for the existing outdoor wood products coating operation to include provisions to paint large metal parts that cannot fit in an existing spray paint booth. These parts include large structural steel beams used in making wine racks.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-2321-10-7, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,



David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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



JAN 9 2013

Wendy Garcia
CBUS OPS Inc (dba Woodbridge Winery)
P O Box 1260
Woodbridge, CA 95258-1260

**Re: Notice of Minor Title V Permit Modification
District Facility # N-2321
Project # N-1120999**

Dear Mr. Garcia:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct N-2321-10-7 into the Title V operating permit. The proposed project was to modify permit for the existing outdoor wood products coating operation to include provisions to paint large metal parts that cannot fit in an existing spray paint booth. These parts include large structural steel beams used in making wine racks.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct N-2321-10-7, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Sincerely,

David Warner
Director of Permit Services

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Tel: 661-392-5500 FAX: 661-392-5585

Title V APPLICATION REVIEW Minor Modification

Facility Number: N-2321
Facility Name: CBUS OPS Inc (dba Woodbridge Winery)
Mailing Address: P O Box 1260
Woodbridge, CA 95258-1260

Contact Name: Wendy Garcia
Phone: (559) 661-5534
Fax: (559) 661-3429

Responsible Official: Mark Gabrielli
Title: General Manager

Processing Staff: Jag Kahlon
Project Number: N-1120999
Date: December 3, 2012

I. PROPOSAL

CBUS OPS Inc (dba Woodbridge Winery) has proposed to incorporate Authority to Construct (ATC) permit N-2321-10-7 into their Title V operating permit. The ATC permit was issued without Certificate of Conformity (COC). The proposed project was to modify permit for the existing outdoor wood products coating operation to include provisions to paint large metal parts that cannot fit in an existing spray paint booth. These parts include large structural steel beams used in making wine racks.

The purpose of this document is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for revising/including new permit conditions that were established under Permit to Operate (PTO) N-2321-10-4.

II. FACILITY LOCATION

This facility is located at 5950 E Woodbridge Road, Acampo, California.

III. EQUIPMENT DESCRIPTION

N-2321-10-8:
OUTDOOR COATING OF WOOD PRODUCTS AND METAL PART AND PRODUCTS

IV. SCOPE OF EPA AND PUBLIC REVIEW

The proposed project is a Minor Modification to the Title V permit because no relaxation was given to the existing monitoring, recordkeeping or reporting requirements, and the project was not an SB-288 or Federal major modification under Rule 2201. Therefore, public review is not required.

V. APPLICABLE REQUIREMENTS

Rule 2520 Federally Mandated Operating Permits (6/21/01)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

N-2321-10

This section details the modifications made to the permit conditions in PTO N-2321-10-4 during processing the project (N-1120998) that resulted in ATC N-2321-10-7.

Equipment Description in PTO N-2321-10-4

OUTDOOR WOOD PRODUCTS COATING OPERATION

The equipment description is updated to the following:

OUTDOOR COATING OF WOOD PRODUCTS AND METAL PART AND PRODUCTS

Condition 1 in PTO N-2321-10-4

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

This condition is contained in permit N-2321-0-1, which contains the requirements applicable to the entire stationary source. Therefore, this condition is no longer necessary in this permit.

Condition 2 in PTO N-2321-10-4

2. Only non-spray (i.e. hand roller, roll coater, dip coat, paint brush, etc.) coating application methods shall be used. [District Rules 2201 and 4606, 5.4]

This condition has been revised, and is now stated as follows:

- Only non-spray (i.e. hand roller, roll coater, dip coat, paint brush, etc.) coating application methods shall be used for wood coating operation. [District Rules 2201 and 4606]

Condition 5 in PTO N-2321-10-4

5. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606, 5.6.10]

This condition has been revised to reflect that this requirement also enforces Rule 4603. The condition is now stated as follows:

- All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rules 4603 and 4606]

Condition 6 in PTO N-2321-10-4

6. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of coating application equipment: 25 g/l (0.21 lb/gal). [District Rules 4603 and 4606]

This condition language has been reworded to stay consistent with other similar permits. The condition is now stated as follows:

- VOC content of solvents used for the operations under this permit shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, repair and maintenance cleaning, and cleaning of coating application equipment. [District Rules 4603 and 4606]

Condition 7 in PTO N-2321-10-4

7. Permittee shall maintain daily records of the following: quantity and type of coatings used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rules 4606, 6.1.1.2 and 2520, 9.3.2]

This condition has been reworded into the following conditions to stay consistent with the latest version of Rule 4606. The condition is now stated as follows:

- The operator shall maintain a current list of coatings, inks, adhesives, and solvents in use which provides all of the data necessary to evaluate compliance, including the following information, as applicable for wood coating operation: a.) identify coatings, catalysts, reducers, inks, adhesives and solvents, b.) manufacturer's recommended mix ratio of components, c.) VOC content of

coatings, as applied, d.) VOC content of solvents, e.) VOC content of inks, as applied, and f.) VOC content of adhesives, as applied. [District Rule 4606]

- The operator shall maintain records on a daily basis that provide the following information, as applicable for wood coating operation: a.) coating and mix ratio of components in the coating used, b.) quantity of each coating applied, c.) identification of coating category, d.) identification and quantity of each ink used, e.) identification and quantity of each adhesive used, and f.) type and amount of solvent used for cleanup and surface preparation. [District Rule 4606]

Condition 8 and 14 in PTO N-2321-10-4

8. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rules 4606, 6.2 and 2520, 9.3.2]
14. Permittee shall maintain a current list of coatings and solvents in use which provides all of the data necessary to evaluate compliance, including the following information, as applicable: identity of coatings, catalysts, reducers, and solvents; manufacturer's recommended mix ratio of components; VOC content of coatings, as applied; and VOC content of solvents. [District Rule 4606, 6.1.1.1]

The above conditions have been replaced with the following condition to stay consistent with the latest version of Rule 4606.

- The operator shall maintain the following records, and have available at all times, a current list of solvents in use which provides all of the data necessary to evaluate compliance, including the following information as applicable for wood coating operation: a.) keep a copy of the manufacturer's product data sheet or material safety data sheet of the solvents used for organic solvent cleaning activities, and b.) maintain a current list of solvents that are being used for organic solvent cleaning activities including the following information: the name of the solvent and its manufacturer's name, the VOC content of the solvent expressed in grams/liter or lb/gallon, when the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content, as applied, and the type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Table 4 of Rule 4606 (10/16/08). [District Rule 4606]

Condition 9 in PTO N-2321-10-4

9. VOC emissions shall not exceed 30.0 pounds in any one day. [District Rule 2201]

This condition has been revised to reflect that this limit is applicable to the wood coating operation. The condition is now stated as follows:

- VOC emissions from the wood coating operation shall not exceed 30.0 pounds in any one day. [District Rule 2201]

Condition 13 in PTO N-2321-10-4

- Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 1070, 4606, 6.0 and 2520, 9.4.2]

This condition has been reworded into the following condition to stay consistent with the latest versions of Rules 4603 and 4606. The condition is now stated as follows:

- The operator shall retain all records on site for a period of five years, make the records available on site during normal business hours to the District, ARB or EPA and submit the records to the District, ARB, or EPA upon request. [District Rules 1070, 2520, 4603 and 4606]

Permit conditions added during the ATC project N-1120998

- Emissions from the metal parts and products coating operation shall not exceed any of the following limits: 30.0 lb-VOC/day and 132 lb-VOC/year; and 35.5 lb-PM10/day and 156 lb-PM10/year. [District Rule 2201]
- VOC emissions shall be estimated as follows: $\text{VOC (lb/day, lb/yr)} = \text{Volume of coatings used (gal/day, gal/yr)} \times \text{material VOC content (lb-VOC/gal)} + \text{solvent use (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}$. [District Rule 2201]
- PM10 emissions shall be estimated as follows: $\text{PM10 (lb/day, lb/yr)} = \text{Volume of coating used (gal/day, gal/yr)} \times \text{solids content (by weight)} \times \text{coating density (lb/gallon)} \times F \times (1 - \text{TE})$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLP/electrostatic use 75%, and for brush, dip, or roll coating application equipment use 100%. [District Rule 2201]
- VOC content, less water and exempt compounds, of coatings used for the outdoor metal parts and products coating operation shall not exceed the following limits: 2.5 lb/gal for general coatings; 2.8 lb/gal for general coatings when the ambient temperature is at or below 60 degrees Fahrenheit; 3.5 lb/gal for air-dried extreme performance coatings. [District Rules 2201 and 4603]
- The permittee shall not use coatings that contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). [District Rules 4002 and 4102]

- Only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used for metal parts or products coating operation. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4603]
- The permittee shall maintain a current list of coatings and solvents in use which contains all of the coating data necessary to evaluate compliance, including the following information, as applicable, for metal parts or products coating operation: mix ratio of components used, VOC content and specific chemical constituents of coatings as applied, and VOC content and specific chemical constituents of solvents used for surface preparation and cleanup. [District Rule 4603]
- The permittee shall maintain daily records which include the following information for metal parts or products coating operation: volume coating/solvent mix ratio, VOC content (lb/gal or grams/liter) and, for dip coating operations, viscosity (CSt) of coating, volume of each coating used (gallons), and quantity of cleanup solvent used (gallons). [District Rule 4603]
- The permittee shall maintain records of daily and annual VOC emissions in pounds for the metal parts and products coating operation. The annual records shall be updated at least on a monthly basis. [District Rule 2201]
- The permittee shall maintain records of daily and annual VOC emissions in pounds for the wood coating operation. The annual records shall be updated at least on a monthly basis. [District Rule 2201]

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, the proposed project:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
 6. Do not seek to consolidate overlapping applicable requirements.

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

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

Compliance is expected with this Rule.

APPENDICES

Appendix I: Proposed Title V Operating Permit No. N-2321-10-8

Appendix II: Authority to Construct N-2321-10-7

Appendix III: Permit Application

Appendix IV: Emissions Change

Appendix V: Title V Permit to Operate N-2321-10-4

Appendix I
Proposed Title V Operating Permit No. N-2321-10-8

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-10-8

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:
OUTDOOR COATING OF WOOD AND METAL PART AND PRODUCTS

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PERMIT UNIT REQUIREMENTS

1. VOC emissions from the wood coating operation shall not exceed 30.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Only non-spray (i.e. hand roller, roll coater, dip coat, paint brush, etc.) coating application methods shall be used for wood coating operation. [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
3. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
4. VOC content of materials for wood products, as applied, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
5. VOC content of solvents used for the operations under this permit shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, repair and maintenance cleaning, and cleaning of coating application equipment. [District Rules 4603 and 4606] Federally Enforceable Through Title V Permit
6. The permittee shall maintain records of daily and annual VOC emissions in pounds for the wood coating operation. The annual records shall be updated at least on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rules 4603 and 4606] Federally Enforceable Through Title V Permit
8. The operator shall maintain a current list of coatings, inks, adhesives, and solvents in use which provides all of the data necessary to evaluate compliance, including the following information, as applicable for wood coating operation: a.) identify coatings, catalysts, reducers, inks, adhesives and solvents, b.) manufacturer's recommended mix ratio of components, c.) VOC content of coatings, as applied, d.) VOC content of solvents, e.) VOC content of inks, as applied, and f.) VOC content of adhesives, as applied. [District Rule 4606] Federally Enforceable Through Title V Permit
9. The operator shall maintain records on a daily basis that provide the following information, as applicable for wood coating operation: a.) coating and mix ratio of components in the coating used, b.) quantity of each coating applied, c.) identification of coating category, d.) identification and quantity of each ink used, e.) identification and quantity of each adhesive used, and f.) type and amount of solvent used for cleanup and surface preparation. [District Rule 4606] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

10. The operator shall maintain the following records, and have available at all times, a current list of solvents in use which provides all of the data necessary to evaluate compliance, including the following information as applicable for wood coating operation: a.) keep a copy of the manufacturer's product data sheet or material safety data sheet of the solvents used for organic solvent cleaning activities, and b.) maintain a current list of solvents that are being used for organic solvent cleaning activities including the following information: the name of the solvent and its manufacturer's name, the VOC content of the solvent expressed in grams/liter or lb/gallon, when the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content, as applied, and the type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Table 4 of Rule 4606 (10/16/08). [District Rule 4606] Federally Enforceable Through Title V Permit
11. Emissions from the metal parts and products coating operation shall not exceed any of the following limits: 30.0 lb-VOC/day and 132 lb-VOC/year; and 35.5 lb-PM10/day and 156 lb-PM10/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. VOC emissions shall be estimated as follows: $\text{VOC (lb/day, lb/yr)} = \text{Volume of coatings used (gal/day, gal/yr)} \times \text{material VOC content (lb-VOC/gal)} + \text{solvent use (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}$. [District Rule 2201] Federally Enforceable Through Title V Permit
13. PM10 emissions shall be estimated as follows: $\text{PM10 (lb/day, lb/yr)} = \text{Volume of coating used (gal/day, gal/yr)} \times \text{solids content (by weight)} \times \text{coating density (lb/gallon)} \times F \times (1 - \text{TE})$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLP/electrostatic use 75%, and for brush, dip, or roll coating application equipment use 100%. [District Rule 2201] Federally Enforceable Through Title V Permit
14. VOC content, less water and exempt compounds, of coatings used for the outdoor metal parts and products coating operation shall not exceed the following limits: 2.5 lb/gal for general coatings; 2.8 lb/gal for general coatings when the ambient temperature is at or below 60 degrees Fahrenheit; 3.5 lb/gal for air-dried extreme performance coatings. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
15. The permittee shall not use coatings that contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). [District Rules 4002 and 4102] Federally Enforceable Through Title V Permit
16. Only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used for metal parts or products coating operation. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
17. The permittee shall maintain a current list of coatings and solvents in use which contains all of the coating data necessary to evaluate compliance, including the following information, as applicable, for metal parts or products coating operation: mix ratio of components used, VOC content and specific chemical constituents of coatings as applied, and VOC content and specific chemical constituents of solvents used for surface preparation and cleanup. [District Rule 4603] Federally Enforceable Through Title V Permit
18. The permittee shall maintain daily records which include the following information for metal parts or products coating operation: volume coating/solvent mix ratio, VOC content (lb/gal or grams/liter) and, for dip coating operations, viscosity (CSt) of coating, volume of each coating used (gallons), and quantity of cleanup solvent used (gallons). [District Rule 4603] Federally Enforceable Through Title V Permit
19. The permittee shall maintain records of daily and annual VOC emissions in pounds for the metal parts and products coating operation. The annual records shall be updated at least on a monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Combined VOC emissions from permit units N-2321-2, N-2321-6, N-2321-7, N-2321-8, and N-2321-10 shall not exceed 15,844 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

21. Records of the total annual VOC emissions for permit units N-2321-2, N-2321-6, N-2321-7, N-2321-8, and N-2321-10 shall be maintained. These records shall be updated at least on a monthly basis. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
22. The operator shall retain all records on site for a period of five years, make the records available on site during normal business hours to the District, ARB or EPA and submit the records to the District, ARB, or EPA upon request. [District Rules 1070, 2520, 4603 and 4606] Federally Enforceable Through Title V Permit

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

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Appendix II
Authority to Construct N-2321-10-7



AUTHORITY TO CONSTRUCT

PERMIT NO: N-2321-10-7

ISSUANCE DATE: 11/15/2012

LEGAL OWNER OR OPERATOR: CBUS OPS INC (DBA WOODBRIDGE WINERY)

MAILING ADDRESS: P O BOX 1260
WOODBRIDGE, CA 95258-1260

LOCATION: 5950 E WOODBRIDGE ROAD
ACAMPO, CA 95220

EQUIPMENT DESCRIPTION:

MODIFICATION OF OUTDOOR WOOD PRODUCTS COATING OPERATION: TO INCLUDE PROVISIONS TO CONDUCT AN OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BECOME: OUTDOOR COATING OF WOOD AND METAL PART AND PRODUCTS

CONDITIONS

1. VOC emissions from the wood coating operation shall not exceed 30.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Only non-spray (i.e. hand roller, roll coater, dip coat, paint brush, etc.) coating application methods shall be used for wood coating operation. [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
3. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
4. VOC content of materials for wood products, as applied, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
5. VOC content of solvents used for the operations under this permit shall not exceed 25 g/l (0.21 lb/gal) for product cleaning during manufacturing process or surface preparation for coating application, repair and maintenance cleaning, and cleaning of coating application equipment. [District Rules 4603 and 4606]

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 Sadrejin, Executive Director / APCD

DAVID WAINNER, Director of Permit Services

N-2321-10-7: Nov 15 2012 11:26AM - KAH/LONZ - Joint Inspection NOT Required

6. The permittee shall maintain records of daily and annual VOC emissions in pounds for the wood coating operation. The annual records shall be updated at least on a monthly basis. [District Rule 2201]
7. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rules 4603 and 4606]
8. The operator shall maintain a current list of coatings, inks, adhesives, and solvents in use which provides all of the data necessary to evaluate compliance, including the following information, as applicable for wood coating operation: a.) identify coatings, catalysts, reducers, inks, adhesives and solvents, b.) manufacturer's recommended mix ratio of components, c.) VOC content of coatings, as applied, d.) VOC content of solvents, e.) VOC content of inks, as applied, and f.) VOC content of adhesives, as applied. [District Rule 4606]
9. The operator shall maintain records on a daily basis that provide the following information, as applicable for wood coating operation: a.) coating and mix ratio of components in the coating used, b.) quantity of each coating applied, c.) identification of coating category, d.) identification and quantity of each ink used, e.) identification and quantity of each adhesive used, and f.) type and amount of solvent used for cleanup and surface preparation. [District Rule 4606]
10. The operator shall maintain the following records, and have available at all times, a current list of solvents in use which provides all of the data necessary to evaluate compliance, including the following information as applicable for wood coating operation: a.) keep a copy of the manufacturer's product data sheet or material safety data sheet of the solvents used for organic solvent cleaning activities, and b.) maintain a current list of solvents that are being used for organic solvent cleaning activities including the following information: the name of the solvent and its manufacturer's name, the VOC content of the solvent expressed in grams/liter or lb/gallon, when the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content, as applied, and the type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Table 4 of Rule 4606 (10/16/08). [District Rule 4606]
11. Emissions from the metal parts and products coating operation shall not exceed any of the following limits: 30.0 lb-VOC/day and 132 lb-VOC/year; and 35.5 lb-PM10/day and 156 lb-PM10/year. [District Rule 2201]
12. VOC emissions shall be estimated as follows: $\text{VOC (lb/day, lb/yr)} = \text{Volume of coatings used (gal/day, gal/yr)} \times \text{material VOC content (lb-VOC/gal)} + \text{solvent use (gal/day, gal/yr)} \times \text{VOC content (lb/gal)}$. [District Rule 2201]
13. PM10 emissions shall be estimated as follows: $\text{PM10 (lb/day, lb/yr)} = \text{Volume of coating used (gal/day, gal/yr)} \times \text{solids content (by weight)} \times \text{coating density (lb/gallon)} \times F \times (1 - \text{TE})$, where F is the fraction (%) of the solids 10 micron or less, if not available, F can be set equal to 1; TE is the coating transfer efficiency of the application equipment, for HVLP/electrostatic use 75%, and for brush, dip, or roll coating application equipment use 100%. [District Rule 2201]
14. VOC content, less water and exempt compounds, of coatings used for the outdoor metal parts and products coating operation shall not exceed the following limits: 2.5 lb/gal for general coatings; 2.8 lb/gal for general coatings when the ambient temperature is at or below 60 degrees Fahrenheit; 3.5 lb/gal for air-dried extreme performance coatings. [District Rules 2201 and 4603]
15. The permittee shall not use coatings that contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). [District Rules 4002 and 4102]
16. Only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used for metal parts or products coating operation. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4603]
17. The permittee shall maintain a current list of coatings and solvents in use which contains all of the coating data necessary to evaluate compliance, including the following information, as applicable, for metal parts or products coating operation: mix ratio of components used, VOC content and specific chemical constituents of coatings as applied, and VOC content and specific chemical constituents of solvents used for surface preparation and cleanup. [District Rule 4603]

CONDITIONS CONTINUE ON NEXT PAGE

18. The permittee shall maintain daily records which include the following information for metal parts or products coating operation: volume coating/solvent mix ratio, VOC content (lb/gal or grams/liter) and, for dip coating operations, viscosity (CSt) of coating, volume of each coating used (gallons), and quantity of cleanup solvent used (gallons). [District Rule 4603]
19. The permittee shall maintain records of daily and annual VOC emissions in pounds for the metal parts and products coating operation. The annual records shall be updated at least on a monthly basis. [District Rule 2201]
20. Combined VOC emissions from permit units N-2321-2, N-2321-6, N-2321-7, N-2321-8, and N-2321-10 shall not exceed 15,844 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Records of the total annual VOC emissions for permit units N-2321-2, N-2321-6, N-2321-7, N-2321-8, and N-2321-10 shall be maintained. These records shall be updated at least on a monthly basis. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
22. The operator shall retain all records on site for a period of five years, make the records available on site during normal business hours to the District, ARB or EPA and submit the records to the District, ARB, or EPA upon request. [District Rules 1070, 2520, 4603 and 4606]

Appendix III
Permit Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED

APR 30 2012

Permit Application For:

**Permits Services
SJVAPCD**

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">RME Inc.-Woodbridge Winery</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>P.O. Box 1260</u> CITY: <u>Woodbridge</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95258</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>5950 E Woodbridge Road</u> CITY: <u>ACAMPO</u> _____% SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: <p style="text-align: center;">Existing Equipment</p>
4. GENERAL NATURE OF BUSINESS: WINE PRODUCTION	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) APPLICATION TO MODIFY N-2321-10-4 TO INCLUDE OUTDOOR METAL PARTS COATING (SEE ATTACHED SUPPLEMENTAL FORMS)	
6. TYPE OR PRINT NAME OF APPLICANT: WENDY GARCIA	TITLE OF APPLICANT: ENVIRONMENTAL ENGINEER
7. SIGNATURE OF APPLICANT: 	DATE: 3/19/2012 PHONE: (559) 661-5534 FAX: (559) 661-3429 EMAIL: Wendy.garcia@cwine.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>N-1120999</u> FACILITY ID: <u>N-2321</u>
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San Joaquin Valley Air Pollution Control District

TITLE V COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

WB Outdoor Metal parts Coating

ADMIN. MODIFICATION

MINOR. MODIFICATION

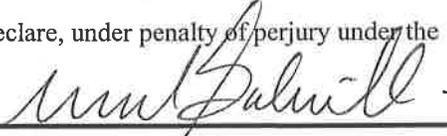
SIGNIFICANT MODIFICATION

COMPANY NAME: RME Inc. – Woodbridge Winery	FACILITY ID: N – 2321
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: CONSTELLATION WINES U.S.	
3. Agent to the Owner: MARK GABRIELLI	

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

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) which the source is in compliance as identified in the Compliance Plan.
- Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term as identified in the Compliance Plan, on a timely basis.
- Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance at the time of permit issuance with the applicable federal requirement(s), as identified in the Compliance Plan, and I have attached a compliance schedule.
- 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

4-23-2012
Date

MARK GABRIELLI
Name of Responsible Official (please print)

GENERAL MANAGER
Title of Responsible Official (please print)

Appendix IV
Emissions Change

Emissions Change

Emissions change under ATC project N-1120998 that resulted in ATC N-2321-10-7 is summarized in the following table.

Emissions Change			
Pollutant	Annual PE2 (lb/yr)	Annual PE1 (lb/yr)	Quarterly IPE (lb/qtr)
NOx	0	0	0
SOx	0	0	0
PM10	156	0	39
CO	0	0	0
*VOC	0	0	0

*VOC increase will be a part of the existing specific limiting condition of 15,844 lb-VOC/yr for permits N-2321-2, N-2321-6, N-2321-7, N-2321-8, and N-2321-10. Therefore, QEC for VOC are set equal to zero.

Appendix V
Title V Permit to Operate N-2321-10-4

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-10-4

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

OUTDOOR WOOD PRODUCTS COATING OPERATION

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Only non-spray (i.e. hand roller, roll coater, dip coat, paint brush, etc.) coating application methods shall be used. [District Rules 2201 and 4606, 5.4] Federally Enforceable Through Title V Permit
3. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606, 5.1] Federally Enforceable Through Title V Permit
4. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606, 5.1] Federally Enforceable Through Title V Permit
5. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606, 5.6.10] Federally Enforceable Through Title V Permit
6. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of coating application equipment: 25 g/l (0.21 lb/gal). [District Rules 4603 and 4606] Federally Enforceable Through Title V Permit
7. Permittee shall maintain daily records of the following: quantity and type of coatings used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rules 4606, 6.1.1.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rules 4606, 6.2 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. VOC emissions shall not exceed 30.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Combined VOC emissions from permit units N-2321-2, N-2321-6, N-2321-7, N-2321-8, and N-2321-10 shall not exceed 15,844 lb-VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Records of the total annual VOC emissions for permit units N-2321-2, N-2321-6, N-2321-7, N-2321-8, and N-2321-10 shall be maintained. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Records of the cumulative annual quantity of VOC emissions from the entire stationary source shall be maintained and updated daily. [District Rules 2201 and 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 1070, 4606, 6.0 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. Permittee shall maintain a current list of coatings and solvents in use which provides all of the data necessary to evaluate compliance, including the following information, as applicable: identity of coatings, catalysts, reducers, and solvents; manufacturer's recommended mix ratio of components; VOC content of coatings, as applied; and VOC content of solvents. [District Rule 4606, 6.1.1.1] Federally Enforceable Through Title V Permit

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