



**DEC 26 2013**

Mr. David Henry  
Sutter Home Winery  
P O Box 248  
St. Helena, CA 94574-0248

**Re: Proposed ATC / Certificate of Conformity (Significant Mod)  
District Facility # N-7855  
Project # N-1131345**

Dear Mr. Henry:

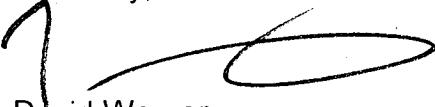
Enclosed for your review is the District's analysis of your application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The proposed project includes the installation of 44 insulated and jacketed stainless steel wine storage tanks with the following capacities: 7,500 gallons (4 tanks); 15,000 gallons (4 tanks); 20,000 gallons (4 tanks); 30,000 gallons (6 tanks); 40,000 gallons (8 tanks); 60,000 gallons (6 tanks); 100,000 gallons (4 tanks); 120,000 gallons (4 tanks), and 200,000 gallons (4 tanks).

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authorities to Construct with Certificates of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with the modifications authorized by these Authorities to Construct, you 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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

  
David Warner  
Director of Permit Services

Enclosures

cc: Mike Tollstrup, CARB (w/enclosure) via email  
cc: Gerardo C. Rios, EPA (w/enclosure) via email

**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



Rule 4102 Nuisance (12/17/92)  
Rule 4694 Wine Fermentation and Storage Tanks (12/15/05)  
California Health & Safety Code 41700 (Public Nuisance)  
California Health & Safety Code 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 18667 Jacob Brack Road in Lodi. The District has determined that this location is not within 1,000 feet of any K-12 school. Therefore, noticing for California Health & Safety Code 42301.6 is not required.

### **IV. PROCESS DESCRIPTION**

Sutter Home Winery operates a wine fermentation and storage facility. During the 'crush season', which typically lasts from August through November, both red and white grapes are received by truck and delivered to a crusher-stemmer that crushes the grapes and removes the stems. For red wines, the resultant juice, called "must", is pumped to red wine fermentation tanks for fermentation, a batch process. The red wine fermentation tanks are specifically designed to ferment the must and to allow the separation of the skins and seeds from the wine after fermentation. For white wines, the must is sent to screens and presses for separation of grape skins and seeds prior to entering the fermentation tank. Since the skins and seed have been separated, white wine fermentation is carried out in a tank that doesn't include design provisions for solids separation.

After transfer of the must (red or white) to the fermentation tank, the must is inoculated with yeast. This initiates the fermentation reactions. The yeast metabolizes the sugars in the must, converting the sugars to ethanol and carbon dioxide (CO<sub>2</sub>). This process is an exothermic process, thus temperature must be controlled throughout the process. Refrigeration is used to maintain a temperature of 45-65°F for white wine fermentation and 70-95°F for red wine fermentation. The sugar content of the fermenting wine is measured in °Brix (weight %) and is typically 22-26° for unfermented wine, dropping to 4° or less by the end of fermentation process. For the wines produced at this facility, the final ethanol concentration is no greater than 23.9%. Batch fermentation requires 5 days per batch of red wine and 1-2 weeks per batch of white wine. VOCs are emitted during the fermentation process, along with CO<sub>2</sub>. The VOCs consist primarily of ethanol along with some trace fermentation byproducts.

For white wine, the wine is directly transferred into storage tanks after completion of the fermentation process. For red wine, the grape skins are separated from the wine and sent to a press. The press crushes residual wine from grape skins. Both red and white wines are stored in refrigerated tanks year-round for blending and bottling. Further VOC emissions occur as a result of the storage tank operation.

The proposed tanks will be used for the winery's blending and bottling operations.

**V. EQUIPMENT LISTING**

The applicant is proposing to install 44 new wine storage tanks. All of the proposed tanks are equipped with pressure/vacuum valves and tank insulation. The tank equipment descriptions are as shown on the Draft Authority to Construct permits in Appendix I.

**VI. EMISSION CONTROL TECHNOLOGY EVALUATION**

VOCs, primarily ethanol, are emitted from wine storage tanks as a result of both working losses (which occur when the liquid level in the tank changes) and breathing losses (expansion and contraction effects due to temperature variations). The proposed pressure/vacuum relief valve limits emissions of VOC's. Additionally, when wine storage tanks are insulated or located in a climate controlled building, breathing losses are considered to be negligible. The proposed tanks will all be insulated and refrigerated.

**VII. CALCULATIONS**

**A. Assumptions**

- VOC is the only pollutant emitted from the tanks.
- The annual wine storage throughput will be equal to eight times the tank storage capacity. (per District practice)
- Other assumptions will be stated as they are made for this project.

**B. Emission Factors (EF)**

The following emission factors are applicable to wine storage tanks. These emission factors are from District FYI-114, "VOC Emission Factors for Wine Fermentation and Storage Tanks (Revised 8/10/11)", and are based on a maximum ethanol content of 23.9% by weight (proposed by applicant, rounded to 24% for purpose of determining emissions).

Wine	Operation	EF2 (lb-VOC/1,000 gal of wine)		Source
		Daily	Annual	
White	Storage	0.366	0.213	District FYI -114
Red	Storage	0.366	0.213	

**C. Calculations**

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

The applicant is proposing to install new tanks. Therefore, PE1 is equal to zero for each tank.

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

Maximum daily emissions from the storage of white or red wine is equal to the following:

$$\text{Daily VOC}_{\text{Storage}} = \text{Tank Capacity (gal)} \times 5 \text{ turnovers/day} \\ \times \text{EF}_{\text{Storage, Daily}} \text{ (lb-VOC/1000 gal)}$$

Annual VOC emissions from the storage of white or red wine is equal to the following:

$$\text{Annual VOC}_{\text{Storage}} = \text{Tank Capacity (gal)} \times 8 \text{ turnovers/year} \\ \times \text{EF}_{\text{Storage, Annual}} \text{ (lb-VOC/1000 gal)}$$

The PE2 values for the proposed tanks are as summarized in the following table:

Permit Unit	Capacity (gallons)	PE2 (lb/day)	PE2 (lb/yr)
N-7855-855-0	7,500	13.7	13
N-7855-856-0	7,500	13.7	13
N-7855-857-0	15,000	27.5	26
N-7855-858-0	15,000	27.5	26
N-7855-859-0	30,000	54.9	51
N-7855-860-0	30,000	54.9	51
N-7855-861-0	30,000	54.9	51
N-7855-862-0	30,000	54.9	51
N-7855-863-0	30,000	54.9	51
N-7855-864-0	30,000	54.9	51
N-7855-865-0	15,000	27.5	26
N-7855-866-0	15,000	27.5	26
N-7855-867-0	7,500	13.7	13
N-7855-868-0	7,500	13.7	13
N-7855-869-0	20,000	36.6	34
N-7855-870-0	20,000	36.6	34
N-7855-871-0	40,000	73.2	68

Permit Unit	Capacity (gallons)	PE2 (lb/day)	PE2 (lb/yr)
N-7855-872-0	40,000	73.2	68
N-7855-873-0	40,000	73.2	68
N-7855-874-0	40,000	73.2	68
N-7855-875-0	40,000	73.2	68
N-7855-876-0	40,000	73.2	68
N-7855-877-0	40,000	73.2	68
N-7855-878-0	40,000	73.2	68
N-7855-879-0	20,000	36.6	34
N-7855-880-0	20,000	36.6	34
N-7855-881-0	100,000	183.0	170
N-7855-882-0	100,000	183.0	170
N-7855-883-0	100,000	183.0	170
N-7855-884-0	100,000	183.0	170
N-7855-885-0	60,000	109.8	102
N-7855-886-0	60,000	109.8	102
N-7855-887-0	60,000	109.8	102
N-7855-888-0	60,000	109.8	102
N-7855-889-0	60,000	109.8	102
N-7855-890-0	60,000	109.8	102
N-7855-891-0	120,000	219.6	204
N-7855-892-0	120,000	219.6	204
N-7855-893-0	120,000	219.6	204
N-7855-894-0	120,000	219.6	204
N-7855-895-0	200,000	366.0	341
N-7855-896-0	200,000	366.0	341
N-7855-897-0	200,000	366.0	341
N-7855-898-0	200,000	366.0	341

### 3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, SSPE1 is the Potential to Emit 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 (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions (AERs) that have occurred at the source, and which have not been used on-site.

This project only involves units that emit VOC's. Therefore, SSPE1 will only be determined for VOC emissions.

<b>Pre-Project Stationary Source Potential to Emit (SSPE1)</b>	
<b>Permit Numbers</b>	<b>PE1 VOC (lb/yr)</b>
N-7855-226 through N-7855-776	292,950
<b>SSPE1</b>	<b>292,950</b>

#### 4. 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.

The facility is proposing to include the new units into their existing SLC for VOC emissions. SSPE2 is shown in the table below.

<b>Post-Project Stationary Source Potential to Emit (SSPE2)</b>	
<b>Permit Numbers</b>	<b>PE2 VOC (lb/yr)</b>
N-7855-226 through N-7855-898	292,950
<b>SSPE2</b>	<b>292,950</b>

#### 5. Major Source Determination

##### Rule 2201 Major Source Determination

Based on the SSPE values above and the major source threshold of 20,000 lb/yr, the facility is an existing major source for VOC. Since SSPE2 = SSPE1, the current project does not change the facility's major source status.

##### Rule 2410 Major Source Determination

Calculations are necessary to determine whether this facility is an existing Major Source for District Rule 2410 purposes. Only VOC and CO<sub>2e</sub> is emitted from this facility.

As indicated above, the pre-project facility-wide VOC potential to emit is 292,950 pounds of VOC per year, equivalent to 146.5 tons of VOC per year.

CO<sub>2e</sub> is emitted from the facility's existing fermentation operations. As discussed in Appendix IV, the facility's maximum fermentation throughput is limited by the total cooperage (total volume of facility tanks), and the maximum fermentation throughput is achieved if only white wine is produced. The calculations in Appendix IV indicate that, based on the existing cooperage, the facility can ferment a maximum of 117.2 million gallons of wine per year. CO<sub>2</sub> emissions due to wine fermentation can be estimated as follows:

$$\text{CO}_2 \text{ (lb/year)} = \text{EF (lb-CO}_2\text{/1,000 gal-wine)} \times \text{annual fermentation throughput (gal/year)}$$

$$\text{EF} = 6,303 \times \text{VF}_{\text{EtOH}}^1$$

Where,  $\text{VF}_{\text{EtOH}}$  is the volume fraction of Ethanol in the wine (gal-ethanol/gal-wine)

The maximum ethanol content for the tanks at this facility is 23.9%. Therefore,

$$\begin{aligned} \text{CO}_2 \text{ (lb/year)} &= (6303 \times 0.239) \text{ lb-CO}_2\text{/1,000 gal-wine)} \\ &\quad \times 117,200,000 \text{ gal-wine/year} \\ &= 176,552,072 \text{ lb-CO}_2\text{/year} \\ &= 88,276 \text{ tons-CO}_2\text{/year} \end{aligned}$$

The facility evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21(b)(1)(i). Therefore, the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)							
	NO2	VOC	SO2	CO	PM	PM10	CO2e
Estimated Facility PE before Project Increase	0.0	146.5	0.0	0.0	0.0	0.0	88,276
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source ? (Y/N)	N	N	N	N	N	N	N

As shown above, the facility is not an existing Major Source for PSD for any pollutant. Therefore, the facility is not an existing Major Source for PSD.

## 6. Baseline Emissions (BE)

The baseline emission (BE) calculations are performed pollutant by pollutant to determine the amount of offsets required, where necessary, when the SSPE1 is greater than the offset threshold.

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

<sup>1</sup> Per <http://www.sbcapcd.org/eng/winery/WineryCO2Calcs.pdf>

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22.

#### Clean Unit Determination for Existing Tanks under SLC

This facility is a major source for VOC emissions. A unit is considered clean if that unit is equipped with an emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application. For a facility with an SLC, all units in the SLC must be clean in order for emission units under the SLC to be considered clean. It was determined in District Project N-1110296 that tanks N-7855-226 through N-7855-700 are clean. All subsequently permitted tanks have triggered BACT in the previous project and are therefore also considered clean. Thus, all the existing tanks under the SLC are clean emission units.

$$BE_{SLC} = PE1_{SLC}$$

#### **7. SB288 Modification**

Pursuant to the 2/8/11 version of the District's Draft Major Modification Policy, calculations for determining whether an SB288 modification is triggered are performed as follows for new units:

$$NEI = \sum(PE2 - \text{Historical Actual Emissions})$$

For new units, each unit's potential to emit is equal to the post project potential to emit for the unit, while the historical actual emissions are equal to zero.

Winery tanks do not operate independently from one another. Therefore, potential emissions from a collection of tanks is not equal to the sum of the maximum potential to emit from each tank, which was calculated earlier. The potential to emit for the tanks was calculated and summarized in Appendix IV, Federal Major Modification calculations. Based on those calculations, the collective PE2 for these tanks is:

$$\begin{aligned} \sum PE2 &= \text{Project Emissions} \\ \sum PE2 &= 27,326 \text{ lb-VOC/year} \\ \sum HAE &= 0 \text{ lb-VOC/year} \end{aligned}$$

Thus,

$$\begin{aligned} NEI &= 27,326 \text{ lb-VOC/year} - 0 \text{ lb-VOC/year} \\ NEI &= 27,326 \text{ lb-VOC/year} \end{aligned}$$

Since the NEI is less than the SB288 Modification threshold of 50,000 lb-VOC/year, this project does not trigger an SB288 Modification.

## **8. Federal Major Modification**

Federal Major Modification calculations are included in Appendix IV. As shown in Appendix IV, the net emission increase is greater than 0. Therefore, this project triggers a Federal Major Modification. As a result, BACT is triggered for VOC emissions for all emission units in this project and a public notice is required.

## **9. Rule 2410 - Prevention of Significant Deterioration (PSD) Applicability Determination**

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO<sub>2</sub> (as a primary pollutant)
- SO<sub>2</sub> (as a primary pollutant)
- CO
- PM
- PM<sub>10</sub>
- Greenhouses gases (GHG): CO<sub>2</sub>, N<sub>2</sub>O, CH<sub>4</sub>, HFCs, PFCs, and SF<sub>6</sub>

As determined in Section VII.D.4 of this document, this facility is not an existing PSD Major Source. Therefore, the project potential to emit from the new units is compared to the PSD major source thresholds to determine if the project is subject to the requirements of Rule 2410.

The facility has an SLC for wine fermentation and storage operations. Since the current project does not involve any change to the SLC, the project does not result in any increase in VOC emissions.

As discussed in Appendix IV, the facility's fermentation throughput is limited by the total cooperage. The maximum fermentation throughput prior to the proposed increase in facility cooperage is 117.2 million gallons per year. The post project maximum fermentation throughput is 123.7 million gallons per year. Thus, the current project could potentially result in an increase of 6.5 million gallons of fermentation throughput per year. CO<sub>2</sub> emissions due to this increase in fermentation throughput are calculated as follows:

$$\text{CO}_2 \text{ (lb/year)} = \text{EF (lb-CO}_2\text{/1,000 gal-wine)} \times \text{annual fermentation throughput (gal/year)}$$

$$EF = 6303 \times VF_{EtOH}$$

Where,  $VF_{EtOH}$  is the volume fraction of Ethanol in the wine (gal-ethanol/gal-wine), which is 23.9%.

$$\begin{aligned} CO_2 \text{ (lb/year)} &= (6303 \times 0.239) \text{ lb-CO}_2/1,000 \text{ gal-wine} \times 6,500,000 \text{ gal-wine/year} \\ &= 9,791,711 \text{ lb-CO}_2/\text{year} \\ &= 4,896 \text{ tons-CO}_2/\text{year} \end{aligned}$$

As discussed above, the facility evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore, the following PSD Major Source thresholds are applicable.

PSD Major Source Determination: Potential to Emit (tons/year)							
	NO2	VOC	SO2	CO	PM	PM10	CO2e
Total PE from New Units	0	0	0	0	0	0	4,896
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
New PSD Major Source ? (Y/N)	N	N	N	N	N	N	N

As shown in the table above, the project potential to emit, by itself, does not exceed any of the PSD major source thresholds. Therefore Rule 2410 is not applicable and no further discussion is required.

### 10. Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. QNEC calculations are included in Appendix V.

## VIII. COMPLIANCE

### Rule 2201 New and Modified Stationary Source Review Rule

#### A. Best Available Control Technology (BACT)

BACT requirements shall be triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless exempted pursuant to Section 4.2, BACT shall be required for the following actions:

- Any new emissions unit or relocation from one Stationary Source to another of an existing emissions unit with a Potential to Emit (PE2) exceeding 2.0 pounds in any one day;

- 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;
- Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

These units only emit VOCs. Thus, BACT can only be triggered for VOC emissions. Daily emissions for each new unit is greater than 2.0 lb-VOC/day. Furthermore, this project triggers a Federal Major Modification. Thus, BACT is triggered for VOC emissions for each winery tank.

BACT Guideline 5.4.13 is applicable to wine storage tanks. Pursuant to the "Top-Down BACT Analysis" in Appendix II of this document, BACT has been satisfied with the following:

VOC: Insulated tank, pressure/vacuum valve set within 10% of the maximum allowable working pressure of the tank, "gas tight" tank operation and continuous storage temperature not exceeding 75°F, achieved within 60 days of completion of fermentation.

The following conditions will be included on the Authority to Construct permits:

- *This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694]*
- *The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694]*
- *The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694]*

**B. Offsets**

**1. Offset Applicability**

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post-project Stationary Source Potential to Emit (SSPE2) equals to or exceeds the offset threshold levels in Table 4-1 or Rule 2201.

Pollutant	SSPE2 (lb/yr)	Offset Thresholds (lb/yr)	Offsets Triggered?
VOC	292,950	20,000	Yes

**2. Emission Offset Quantity (EOQ)**

This facility's total VOC emissions are above the offset threshold of 20,000 pounds per year. Therefore, EOQ calculations are required for this project. Section 4.7.1 states that for pollutants with SSPE1 greater than the emission offset threshold levels, the EOQ shall be calculated as the sum of the differences of post-project Potential to Emit (PE2) and the Baseline Emissions (BE) of all new and modified emissions units, plus all increases in Cargo Carrier emissions. Thus,

$$EOQ = \Sigma(PE2 - BE) + ICCE, \text{ where}$$

PE2 = Post-Project Potential to Emit (lb/yr)

BE = Baseline Emissions (lb/yr)

ICCE = Increase in Cargo Carrier emissions (lb/yr)

There is no increase in Cargo Carrier emissions from this project. Additionally, this facility is subject to an SLC for VOC emissions. Thus,

$$EOQ = \Sigma(PE2_{SLC} - BE_{SLC})$$

The existing tanks, when operated in wine storage or fermentation mode, are Clean Emission Units since they meet the achieved-in-practice BACT requirements for wine storage and fermentation process. Thus, BE is set equal to PE1 for each tank.

$$EOQ = \Sigma(PE2_{SLC} - PE1_{SLC})$$

Both pre-project and post-project VOC emissions from the facility's fermentation and storage operations are limited to 292,950 pounds per year. Therefore,

$$\begin{aligned} EOQ &= PE2_{SLC} - PE1_{SLC} \\ &= 292,950 \text{ lb-VOC/yr} - 292,950 \text{ lb-VOC/yr} \\ &= 0 \text{ lb-VOC/yr} \end{aligned}$$

Therefore, the quantity of offsets required for this project is equal to zero.

**C. Public Notification**

**1. Applicability**

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSPE of greater than 20,000 lb/year for any pollutant.

**a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications**

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in Section VII.C.8, this project is a Federal Major Modification. Therefore, public noticing for Federal Major Modification purposes is required.

**b. New Units with PE > 100 lb/day**

As shown in Section VII.C.2, the project includes 18 tanks each with a PE greater than 100 lb/day for VOC emissions. Therefore, a public notice is required for daily PE purposes.

**c. Offset Threshold**

The following table compares the SSPE1 with the SSPE2 in order to determine if any offset thresholds have been surpassed with this project.

<b>Offset Threshold</b>				
<b>Pollutant</b>	<b>SSPE1 (lb/year)</b>	<b>SSPE2 (lb/year)</b>	<b>Offset Threshold</b>	<b>Offset Threshold Surpassed?</b>
VOC	292,950	292,950	20,000 lb/year	No

As demonstrated in the table above, there were no thresholds surpassed due to this project; therefore public noticing is not required for offset threshold purposes.

**d. SSIPE > 20,000 lb/year**

Public notification is required for any permitting action that results in a Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e.  $SSIPE = SSPE2 - SSPE1$ . The values for SSPE2 and SSPE1 are calculated according to Rule 2201, Sections 4.9 and 4.10, respectively. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table:

<b>Stationary Source Increase in Permitted Emissions [SSIPE] – Public Notice</b>					
<b>Pollutant</b>	<b>SSPE2 (lb/year)</b>	<b>SSPE1 (lb/year)</b>	<b>SSIPE (lb/year)</b>	<b>SSIPE Public Notice Threshold</b>	<b>Public Notice Required?</b>
VOC	292,950	292,950	0	20,000 lb/year	No

As demonstrated in the table above, the SSIPE is less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

**2. Public Notice Action**

Public notice is required for exceeding the Federal Major Modification and daily PE thresholds. Therefore, a public notice will be completed prior to issuance of Authority to Construct permits.

**D. Daily Emission Limits (DELs)**

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

**Proposed Rule 2201 (DEL) Conditions:**

The following conditions will be placed on each Authority to Construct permit:

- *The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201]*
- *The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated in the equipment description. [District Rule 2201]*

## **E. Compliance Assurance**

### **1. Source Testing**

Since winery tank emissions are based on generally accepted emission factors, source testing is not required to demonstrate compliance.

### **2. Monitoring**

Monitoring is not required to demonstrate compliance with Rule 2201 requirements.

### **3. Recordkeeping**

For each storage tank, the facility will be required to keep daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, the volume of wine transferred, the total gallons of wine contained in the tank, and the maximum temperature of the stored wine.

These records are required to be retained on-site for a period of at least five years and made available for District inspection upon request.

### **4. Reporting**

No reporting is required to demonstrate compliance with Rule 2201.

## **F. Compliance Certification**

Sutter Home Winery has submitted the required compliance certifications, which are attached as Appendix III.

## **G. Alternative Siting Analysis**

Section 4.15.1 of this rule requires that, for sources for which an analysis of alternative sites, sizes, and production processes is required under Section 173 of the Federal Clean Air Act, the applicant shall prepare an analysis functionally equivalent to the requirements of Division 13, Section 21000 et. seq. of the Public Resources Code.

This proposed project will be installed at an existing winery with more than 600 existing wine processing tanks, located in a rural area of San Joaquin County. The area is a long-established grape-growing and processing region and a number of wineries are present in the immediate area. The existing facility is vertically integrated to receive bulk truck shipments of grapes, crush and press the grapes, ferment the juice to wine, and perform post fermentation processing to produce finished wine. To support these various operations the facility features a large amount of support equipment, services and structures such as raw material receiving stations, crushers, pumps and piping, filtering

and refrigeration units, electric and natural gas utilities, warehouses, laboratories, shipping facilities and administration buildings.

The applicant proposes to install 44 new wine storage tanks to be used only for bottling operations. The existing plant infrastructure and processing equipment including the crushing and pressing equipment are adequately sized to support operation of the proposed post project tank population. Installation of the project at an alternate site would not be practical or feasible based on the following considerations:

- Since wine tanks operate synergistically in post-fermentation storage, processing, blending and bottling, the potential production capacity of the new tanks could not be fully met by installing the new tanks at an alternate location.
- Use of an alternate project site would require installation of a complete new plant infrastructure and supporting processes and equipment to support the independent operation, thus duplicating the infrastructure already present at the existing plant. Construction of the project at an alternate site would be expected to produce a significantly greater environmental impact due to both 1) a much larger initial construction project and 2) incrementally larger on-going emissions and other impacts due to operation of redundant infrastructure and support systems as well as emissions associated with product transportation required to achieve some degree of integration with the existing facility.

#### **H. Ambient Air Quality Analysis**

An Ambient Air Quality Analysis is typically performed for projects that trigger a public notice; however, there is no Ambient Air Quality Standard for VOC and CO<sub>2</sub> emissions. This project only involves units that emit VOC and CO<sub>2</sub>; therefore, an Ambient Air Quality Analysis is not required for this project.

#### **District Rule 2410 Prevention of Significant Deterioration**

The provisions of this rule shall apply to any source and the owner or operator of any source subject to any requirements under Title 40 Code of Federal Regulations (40 CFR) Part 52.21 as incorporated into this rule.

As demonstrated in Section VII.D.9 of this document, the proposed project is not subject to the requirements of Rule 2410; therefore no further discussion is required.

#### **Rule 2520 Federally Mandated Operating Permits**

Sutter Home Winery possesses a Title V permit. The proposed project is considered a Significant Modification to the Title V permit since this project triggers a Federal Major Modification under Rule 2201. Therefore, the following conditions will be listed on each permit:

- *{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]*
- *{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]*

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 permit (Appendix I 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 IV of this document)

Section 5.3.4 of this rule requires the permittee shall file an application for administrative permit amendments prior to implementing the requested change except when allowed by the operational flexibility provisions of section 6.4 of this rule.

Sutter Home Winery is expected to notify the District by filing TV Form-008 upon implementing the ATCs. Therefore, compliance with the requirements of this Rule is expected.

#### **Rule 4001 New Source Performance Standards (NSPS)**

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to wine fermentation and storage tank operations.

#### **Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)**

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to wine fermentation and storage tank operations.

## **Rule 4102 Nuisance**

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. The following condition will be placed on each permit:

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

## **California Health & Safety Code 41700 - Health Risk Assessment**

District Policy APR 1905 - Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

Ethanol (VOC) and CO<sub>2</sub> are not hazardous air pollutants (HAP) as defined in Section 44321 of the California Health and Safety Code. Therefore, health risk assessment is not necessary.

Compliance with this rule is expected.

## **Rule 4694 Wine Fermentation and Storage Tanks**

The purpose of this rule is to reduce emissions of volatile organic compounds (VOC) from the fermentation and bulk storage of wine, or achieve equivalent reductions from alternative emission sources. This rule is applicable to all facilities with fermentation emissions in excess of 10 tons-VOC/year. The storage tank provisions of Section 5.2 of this rule apply only to tanks with capacity in excess of 5,000 gallons and that are not constructed out of concrete or wood.

Section 5.1 requires the winery operator to achieve Required Annual Emissions Reductions (RAER) equal to at least 35% of the winery's Baseline Fermentation Emissions (BFE). Per the definition of RAER in Section 3.25 of the Rule, the RAER may be achieved by any combination of Fermentation Emission Reductions (FER), Certified Emission Reductions (CER) or District Obtained Emission Reductions (DOER) as established in the facility's District-approved Rule 4694 Compliance Plan, due every three years on December 1<sup>st</sup> beginning in 2006. The facility has submitted the required plan to the District and is currently satisfying the required emission reductions in the form of Certified Emission Reductions.

Section 5.2 places specific restrictions on wine storage tanks with 5,000 gallons or more in capacity when such tanks are not constructed of wood or concrete. Section 5.2.1 requires these tanks to be equipped and operated with a pressure-vacuum relief valve meeting all of the following requirements:

- The pressure-vacuum relief valve shall operate within 10% of the maximum allowable working pressure of the tank,

- The pressure-vacuum relief valve shall operate in accordance with the manufacturer's instructions, and
- The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings.
- The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21.

All of the proposed tanks are larger than 5,000 gallons and constructed out of stainless steel. Thus, the following conditions will be included on each Authority to Construct permit:

- *This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694]*
- *The pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21 [District Rules 2201 and 4694]*

Section 5.2.2 requires that the temperature of the stored wine be maintained at or below 75° F.

The following condition will be included on each Authority to Construct permit:

- *The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694]*

Sections 6.1 and 6.2 require the facility to submit a Three-Year Compliance Plan and a Three-Year Compliance Plan Verification respectively. Section 6.3 requires that an Annual Compliance Plan Demonstration be submitted to the District no later than February 1 of each year to show compliance with the applicable requirements of the rule. Section 6.4 requires that records required by this rule be maintained, retained on-site for a minimum of five years, and made available to the APCO upon request. Section 6.4.3 requires that all monitoring be performed for any Certified Emission Reductions as identified in the facility's Three-Year Compliance Plan and that the records of all monitoring be maintained.

Section 6.4.2 requires that weekly records be kept of wine volume and temperature in each storage tank. Therefore, the following conditions will be included on each Authority to Construct permit:

- *Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694]*
- *The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rules 2201 and 4694]*

Section 6.4.3 requires that all monitoring be performed for any Certified Emission Reductions as identified in the facility's Three-Year Compliance Plan and that the records of all monitoring be maintained.

Compliance with this rule is expected.

### **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 County of San Joaquin (County) is the public agency having principal responsibility for approving the project. As such, the County served as the Lead Agency (CCR §15367). In approving the project, the Lead Agency prepared and adopted a Negative Declaration. The Lead agency filed a Notice of Determination, stating that the environmental document was adopted pursuant to the provisions of CEQA and concluding that the project would not have a significant effect on the environment.

The District is a Responsible Agency for the project because of its discretionary approval power over the project via its Permits Rule (Rule 2010) and New Source Review Rule (Rule 2201), (CCR §15381). As a Responsible Agency the District complies with CEQA by considering the environmental document prepared by the Lead Agency, and by reaching its own conclusion on whether and how to approve the project (CCR §15096).

The District has considered the Lead Agency's environmental document and finds that it adequately characterizes the project's potential impact on air quality. In addition, all feasible and cost-effective control measures to reduce potential impacts on air quality resulting from project related stationary source emissions have been applied to the project as part of BACT. Furthermore, the District has conducted an engineering evaluation of the project, this document, which demonstrates that Stationary Source emissions from the project would be reduced. Thus, the District finds that through a combination of project design elements, compliance with applicable District rules and regulations, and compliance with District air permit conditions, project specific stationary source emissions would be reduced to lessen the impacts on air quality. The District does not have authority over any of the other project impacts and has, therefore, determined that no additional findings are required (CEQA Guidelines §15096(h)).

**IX. RECOMMENDATION**

Compliance with all applicable regulations is expected. Therefore, issuance of the ATCs is recommended upon addressing comments from the public, EPA, CARB, and the applicant.

**X. BILLING INFORMATION**

The billing information for the proposed new tanks is as summarized below:

Permit Number	Fee Schedule	Fee Description	Annual Fee
N-7855-855-0, 856-0, 867-0, and 868-0	3020-05-B	7,500 gal	\$93
N-7855-857-0, 858-0, 865-0, and 866-0	3020-05-B	15,000 gal	\$93
N-7855-869-0, 870-0, 879-0, and 880-0	3020-05-C	20,000 gal	\$135
N-7855-859-0 thru 864-0	3020-05-C	30,000 gal	\$135
N-7855-871-0 thru 878-0	3020-05-C	40,000 gal	\$135
N-7855-885-0 thru 890-0	3020-05-D	40,000 gal	\$185
N-7855-881-0 thru 884-0	3020-05-E	100,000 gal	\$246
N-7855-891-0 thru 894-0	3020-05-E	120,000 gal	\$246
N-7855-895-0 thru 898-0	3020-05-E	200,000 gal	\$246

**XI. APPENDICES**

- Appendix I: Draft ATC Permits
- Appendix II: BACT Guideline 5.4.13 and Top-Down BACT Analysis
- Appendix III: Compliance Certification
- Appendix IV: Federal Major Modification Calculations
- Appendix V: Quarterly Net Emissions Change Calculations

Appendix I  
Draft ATC Permits

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-855-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

7,500 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1050) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-855-0 : Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

# AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-856-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

7,500 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1051) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-856-0 : Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**  
ISSUANCE DATE: DRAFT

**PERMIT NO:** N-7855-857-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

15,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1052) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-857-0 : Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** N-7855-858-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

15,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1053) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-858-0 : Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

# AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-859-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

EQUIPMENT DESCRIPTION:  
30,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1054) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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

**DRAFT**  
DAVID WARNER, Director of Permit Services

N-7855-859-0 : Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-860-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

30,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1055) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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

**DRAFT**

DAVID WARNER, Director of Permit Services  
N-7855-860-0 : Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-861-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

EQUIPMENT DESCRIPTION:  
30,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1056) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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

**DRAFT**

DAVID WARNER, Director of Permit Services  
N-7855-861-0 : Dec 24 2013 2:44PM -- AIYABEU : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** N-7855-862-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

30,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1057) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-862-0 : Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**  
ISSUANCE DATE: DRAFT

**PERMIT NO:** N-7855-863-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**  
30,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1058) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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

**DRAFT**

DAVID WARNER, Director of Permit Services  
N-7855-863-0: Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-864-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

30,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1059) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-864-0 : Dec 24 2013 2:44PM -- AIYABEU : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**  
ISSUANCE DATE: DRAFT

**PERMIT NO:** N-7855-865-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

15,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1060) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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

**DRAFT**

DAVID WARNER, Director of Permit Services  
N-7855-865-0 : Dec 24 2013 2:44PM -- AIYABEU : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** N-7855-866-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**  
15,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1061) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-866-0 : Dec 24 2013 2:44PM -- ALYABEU : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**  
ISSUANCE DATE: DRAFT

**PERMIT NO:** N-7855-867-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**  
7,500 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1062) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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

**DRAFT**

DAVID WARNER, Director of Permit Services  
N-7855-867-0 : Dec 24 2013 2:44PM -- AIYABELJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-7855-868-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

7,500 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1063) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-868-0: Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** N-7855-869-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**  
20,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1064) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-869-0 : Dec 24 2013 2:44PM - AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-870-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

20,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1065) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-870-0 : Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** N-7855-871-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**  
40,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1066) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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

**DRAFT**

DAVID WARNER, Director of Permit Services  
N-7855-871-0 : Dec 24 2013 2:44PM -- AIYABEU : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-872-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

40,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1067) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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

**DRAFT**

DAVID WARNER, Director of Permit Services  
N-7855-872-0 : Dec 24 2013 2:44PM -- AIYABEU : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**  
**DRAFT**

**PERMIT NO:** N-7855-873-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

40,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1068) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-873-0 : Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-874-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

EQUIPMENT DESCRIPTION:  
40,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1069) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-874-0 - Dec 24 2013 2:44PM -- AIYABEIJ - Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-875-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

40,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1070) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-875-0 : Dec 24 2013 2:44PM -- AIYABEU : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** N-7855-876-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

40,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1071) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-876-0 - Dec 24 2013 2:44PM -- AIYABEU : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** N-7855-877-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

40,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1072) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-877-0 : Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-878-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

EQUIPMENT DESCRIPTION:  
40,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1073) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-878-0 - Dec 24 2013 2:44PM -- AIYABEIJ - Joint Inspection NDT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** N-7855-879-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

20,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1074) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-879-0 : Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-880-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

20,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1075) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-880-0 : Dec 24 2013 2:44PM -- A1YABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**  
ISSUANCE DATE: DRAFT

**PERMIT NO:** N-7855-881-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

100,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1076) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-881-0 : Dec 24 2013 2:44PM -- AIYABEJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-882-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

100,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1077) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-882-0 : Dec 24 2013 2:44PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** N-7855-883-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**  
100,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1078) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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

**DRAFT**

DAVID WARNER, Director of Permit Services  
N-7855-883-0 : Dec 24 2013 2:45PM -- AIYABEU : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-884-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

100,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1079) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-884-0 : Dec 24 2013 2:45PM -- AIYABEU : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-885-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

60,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1080) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-885-0 : Dec 24 2013 2:45PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** N-7855-886-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

60,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1081) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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

**DRAFT**

DAVID WARNER, Director of Permit Services  
N-7855-886-0 : Dec 24 2013 2:45PM -- ALYABEU : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**  
**DRAFT**

**PERMIT NO:** N-7855-887-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

60,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1082) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-887-0 : Dec 24 2013 2:45PM -- AIYABELJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-888-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

EQUIPMENT DESCRIPTION:  
60,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1083) WITH PRESSURE/VACUUM VALVE AND INSULATION

### 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-888-0 - Dec 24 2013 2:45PM - AITYABEIJ - Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** N-7855-889-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**  
60,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1084) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-889-0 : Dec 24 2013 2:45PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-890-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

60,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1085) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-890-0 : Dec 24 2013 2:45PM -- AIVABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** N-7855-891-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**  
120,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1086) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-891-0: Dec 24 2013 2:45PM - AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-892-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

120,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1087) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-892-0 : Dec 24 2013 2:45PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** N-7855-893-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**  
120,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1088) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-893-0 : Dec 24 2013 2:45PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** N-7855-894-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**  
120,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1089) WITH PRESSURE/VACUUM VALVE AND INSULATION

**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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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

**DRAFT**

DAVID WARNER, Director of Permit Services  
N-7855-894-0, Dec 24 2013 2:45PM - AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** N-7855-895-0

**LEGAL OWNER OR OPERATOR:** SUTTER HOME WINERY  
**MAILING ADDRESS:** ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

**LOCATION:** 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

200,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1090) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-895-0 : Dec 24 2013 2:45PM -- AIYABEJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-896-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

EQUIPMENT DESCRIPTION:  
200,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1091) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-896-0 : Dec 24 2013 2:45PM - A1YABEUJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-897-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

EQUIPMENT DESCRIPTION:  
200,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1092) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-897-0; Dec 24 2013 2:45PM -- AIYABEUJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-7855-898-0

LEGAL OWNER OR OPERATOR: SUTTER HOME WINERY  
MAILING ADDRESS: ATTN: DAVE HENRY  
P O BOX 248  
ST HELENA, CA 94574-0248

LOCATION: 18667 N JACOB BRACK RD  
LODI, CA 95242

**EQUIPMENT DESCRIPTION:**

200,000 GALLON STAINLESS STEEL WINE STORAGE TANK (TANK 1093) WITH PRESSURE/VACUUM VALVE AND INSULATION

## 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. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The daily tank throughput, in gallons, shall not exceed five times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Annual emissions from all wine fermentation and storage tanks, calculated on a twelve month rolling basis, shall not exceed the following limit: VOC - 292,950 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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-7855-898-0 : Dec 24 2013 2:45PM -- AIYABEIJ : Joint Inspection NOT Required

7. Combined annual VOC emissions from all wine storage operations shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The annual VOC wine storage emission factor for each wine or spirits ethanol content shall be calculated using the following equation:  $EF = a * P^2 + b * P + c$ ; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. For concentrations up to and including 24 volume %,  $a = -4.5139E-5$ ,  $b = 0.01088$  and  $c = 0$ . [District Rule 2201] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
10. The pressure-vacuum relief valve and the storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
11. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
12. Daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
13. The operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694] Federally Enforceable Through Title V Permit
14. The permittee shall maintain the following records: Red wine and white wine produced by fermentation at this facility, based on the values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), US Department of Treasury, the volume and the ethanol concentration of each wine movement; and the calculated rolling VOC emission rate (lb-VOC per 12 month rolling period, calculated monthly). [District Rule 2201] Federally Enforceable Through Title V Permit
15. If the emissions calculated for any rolling 12-month period exceed the annual emissions limitations of this permit, in a crush season in which the start of the crush season (defined as the day on which the facility's seasonal crushing/fermentation operations commence) occurs less than 365 days after the start of the previous crush season, then no violation of the annual emissions limit for that rolling 12-month period will be deemed to have occurred so long as the calendar year emissions are below the annual emissions limitation. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be maintained that demonstrate the date of each year's start of crush season. [District Rule 2201] Federally Enforceable Through Title V Permit
17. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

Appendix II  
BACT Guideline 5.4.13 and Top-Down BACT Analysis

San Joaquin Valley  
Unified Air Pollution Control District

**Best Available Control Technology (BACT) Guideline 5.4.13\***

Last Update 10/6/2009

**Wine Storage Tank**

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC	1. Insulation or Equivalent**, Pressure Vacuum Relief Valve (PVRV) set within 10% of the maximum allowable working pressure of the tank; "gas-tight" tank operation; and continuous storage temperature not exceeding 75 degrees F, achieved within 60 days of completion of fermentation.	1. Capture of VOCs and thermal or catalytic oxidation or equivalent (98% control)  2. Capture of VOCs and carbon adsorption or equivalent (95% control)  3. Capture of VOCs and absorption or equivalent (90% control)  4. Capture of VOCs and condensation or equivalent (70% control)	

\*\*Tanks made of heat-conducting materials such as stainless steel may be insulated or stored indoors (in a completely enclosed building, except for vents, doors and other essential openings) to limit exposure of diurnal temperature variations. Tanks made entirely of non-conducting materials such as concrete and wood (except for fittings) are considered self-insulating.

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

**\*This is a Summary Page for this Class of Source**

## Top-Down BACT Analysis for VOCs from Wine Storage Operations

### **Step 1 - Identify All Possible Control Technologies**

The SJVUAPCD BACT Clearinghouse guideline 5.4.13, 2nd quarter 2012, identifies the following control equipment options for VOC emissions.

- 1) Insulation or Equivalent, Pressure Vacuum Relief Valve (PVRV) set within 10% of the maximum allowable working pressure of the tank; "gas-tight" tank operation; and continuous storage temperature not exceeding 75 degrees F, achieved within 60 days of completion of fermentation.
- 2) Capture of VOCs and thermal or catalytic oxidation or equivalent (98% control)
- 3) Capture of VOCs and carbon adsorption or equivalent (95% control)
- 4) Capture of VOCs and absorption or equivalent (90% control)
- 5) Capture of VOCs and condensation or equivalent (70% control)

### **Step 2 - Eliminate Technologically Infeasible Options**

None of the above listed technologies are technologically infeasible.

### **Step 3 - Rank Remaining Control Technologies by Control Effectiveness**

- 1) Capture of VOCs and thermal or catalytic oxidation or equivalent (98% control)
- 2) Capture of VOCs and carbon adsorption or equivalent (95% control)
- 3) Capture of VOCs and absorption or equivalent (90% control)
- 4) Capture of VOCs and condensation or equivalent (70% control)

### **Step 4 - Cost Effectiveness Analysis**

The cost-effectiveness analysis will be performed based on the following items:

- Since the most cost effective approach will be achieved by installing a common control device for multiple tanks, the analysis will be based on this approach.
- The cost-effectiveness analysis will be based on a hypothetical "industry-typical" storage tank operation consisting of a battery of twelve storage tanks each with a capacity of 200,000 gallons each. Total annual throughput for the hypothetical tank battery is 19.2 million gallons per year (200,000 gallons x 12 tanks x 8 turnovers/year). Based on economies of scale, it is obvious that any control found to not be cost-effective at this level of throughput would be even less cost-effective at lower capacities.

### Industry Standard

During the development of District Rule 4694, it was determined that use of pressure/vacuum valves and some level of refrigeration on wine storage tanks is a standard operation for large wineries in the San Joaquin Valley. Additionally, all storage tanks are insulated. This was directly confirmed with four large wineries: Mission Bell (Madera), Gallo-Livingston, Bronco, and Robert Mondavi. Based on this, the wine storage tank VOC control requirements of District Rule 4694 and tank insulation are also determined to be "industry standard". The emission factor for "industry standard" operation is determined based on Table 1 of the District's FYI-114, Estimating Emissions from Wine Storage Tanks for an insulated storage tank.

EF (industry standard) = 0.235 lb-VOC/1000 gal of wine throughput (23.9% alcohol vol.)

### Uncontrolled emissions for Twelve-Tank Battery

=  $(19.2 \times 10^6 \text{ gal/year}) \times (0.235 \text{ lb-VOC/1000 gal})$   
= 4,512 lb/year

### Capture of VOCs with Thermal or Catalytic Oxidation/ Carbon Adsorption/Absorption or Condensation

A common feature of all of these options is that they require installation of a collection system for delivering the VOCs from the tanks to the common control device. The analysis below indicates that these options are not cost effective by showing that just the annualized direct cost for the ductwork of the collection system and supporting structural steel and foundations alone is too large, when considered at the District's cost effectiveness threshold for VOC BACT, to justify the capital investment required by these options. This approach ignores additional major costs for the actual control device and its installation and for equipment sterilization systems for ductwork and control device, instrumentation and control systems for isolation of individual tanks in the battery, site specific factors due to limited plot space (known to be a significant factor at all wineries), and operating and maintenance costs for each system. Should all these additional cost factors be included, the calculated cost effectiveness would be substantially higher than indicated the table in this section.

### Emission Reductions

Thermal or catalytic oxidation technology is capable of reducing 98% of VOC emissions while the remaining options under consideration have lesser control efficiencies. Showing that all of the options under consideration are not cost effective at a 98% reduction level based on capital investment requirements of ductwork and steel alone is adequate since options other than thermal/catalytic oxidation would be even less cost effective at their actual (lower) reduction levels.

= 4,512 lb-VOC/year × 0.98  
= 4,422 lb-VOC/year  
= 2.2 tons-VOC/year

### Capital Investment for Installation of a VOC Collection System

#### *Design and Estimate Basis:*

- The basis and approach for the capital cost estimate for ductwork and support steel is summarized in the following table.
- The collection system consists of stainless steel plate ductwork (stainless steel is required due to cleanliness and sterilization requirements for wine quality considerations and due to the food grade product status) with isolation valving, connecting twelve 200,000 gallon tanks to a common manifold system which ducts the combined vent to the common control device. The cost of dampers and isolation valving, installed in the ductwork, will not be included in the cost estimate.
- A minimum duct size is established at 6 inches diameter at each tank to ensure minimal backpressure of the tank during filling operations and to provide adequate strength for spanning between supports. The main header is 12" diameter to handle the potential for simultaneously venting all tanks based on a potential fill rate of 1000 gpm for each tank (typical) and a duct velocity of 2000 feet per minute.
- The ductwork is designed with features to facilitate clean-in-place (CIP) operation to allow for periodic sterilization procedures as required for food grade products. The CIP system includes strategically placed spray nozzles on the ductwork for injecting sterilizing solutions into the system. Cost impacts to install CIP systems to clean the ducting are not included in the cost estimate.
- The ductwork is supported on a structural steel pipe rack mounted on drilled concrete piers, running through the new tank battery. Ducting elevations are established to allow continuous free draining to the separator located at the control device.
- Unit Installed Costs for Ductwork: A direct cost estimate for 12" diameter stainless steel ductwork, installed in a San Joaquin Valley winery, was taken from a study prepared by Eichleay Engineering for the Wine Institute in conjunction with development of District Rule 4694.<sup>2</sup> The estimate is based on 2nd quarter 2005 dollars, and includes fittings, miscellaneous duct supports and other materials plus field labor costs required to install the ductwork, but does not include other associated indirect costs such as construction management, engineering, owner's cost, contingency, etc. BACT Attachment 1 presents the development of unit installed costs for stainless steel ducting based on the costs derived from the Eichleay estimate.

---

<sup>2</sup> Eichleay Engineers of California, Fermenter VOC Emissions Control Cost Estimate (Revision 1), Eichleay Project Numbers 30892 and 30913, June 30, 2005

A linear foot of ducting required was extracted from the Eichleay Estimate for a similar system at Gallo-Livingston (See BACT Attachment 1 in project C1090293).

- Costs for structural steel supports and foundations were extracted from the Eichleay Estimate for a similar system at Gallo-Livingston (See BACT Attachment 1 in project C1090293).
- Sales tax of 8% was applied to all materials.
- Indirect costs include Engineering, Construction Expense and Contractor's Fee and Contingency. Factors for these costs are taken from Peters & Timmerhaus<sup>3</sup>.
- Capital costs taken from the Eichleay estimate are 2005 dollars. These are escalated to 2011 based on 3% overall escalation per year.

*Capital Investment for VOC Capture System:*

The table on the following page summarizes the cost of the VOC capture system.

---

<sup>3</sup> Peters & Timmerhaus, Plant Design and Economics for Chemical Engineers, 2<sup>nd</sup> Edition, McGraw-Hill, 1968, p.140.

<b>Fixed Capital Investment</b>									
Item	Qty	Unit	Unit Material Cost	Total Item Material Cost	Unit Labor Cost	Total Item Labor Cost	Unit Subcontract Price	Total Item Subcontract Cost	Total Item Direct Cost
<u>Direct Cost</u>									
6" Dia. Ducting	75	ft	\$32.11	\$2,408	\$29.20	\$2,190			\$4,598
12" Dia. Ducting	870	ft	\$75.33	\$65,537	\$68.49	\$59,586			\$125,123
Drilled Piers	32	ea.					\$1,000.00	\$32,000	\$32,000
Structural Steel Supports	1	lot	\$45,273	\$287,630	\$45,273	\$45,273			\$332,903
Direct Cost Subtotals				\$355,575		\$107,049		\$32,000	\$494,624
Sales Tax				\$28,446					\$28,446
Total Direct Cost				\$384,021		\$107,049		\$32,000	\$523,070
<u>Indirect Costs</u>									
Engineering @ 15% of Direct Cost									\$78,461
Construction Expense and Contractor's Fee @ 20% of Direct Cost									\$104,614
Contingency @ 15% of Fixed Capital Investment									\$124,614
Fixed Capital Investment (2005 Cost)									\$830,759
Escalation to 2011 @ 3%/year									\$161,211
Fixed Capital Investment (2011 Cost)									\$991,970

The total capital investment is annualized over 10 years assuming 10% interest. The following formula is used to determine the annualized cost:

$$ATCI = (P) \left[ \frac{(i)(1+i)^n}{(1+i)^n - 1} \right]$$

Where:

ATCI: Annualized total capital investment  
P: Present value  
i: Interest rate (District policy is to use 10%)  
n: 10 years

$$ATCI = (\$991,970) \left[ \frac{(0.1)(1+0.1)^{10}}{(1+0.1)^{10} - 1} \right] = \frac{\$161,439}{\text{yr}}$$

$$\begin{aligned} \text{Cost of Reduction (\$/ton)} &= \$161,439/\text{yr} \div 2.2 \text{ tons-VOC/yr} \\ &= \$73,381/\text{ton-VOC} \end{aligned}$$

The cost of VOC reductions considering the capture system alone is more than the threshold limit of \$17,500/ton; therefore, none of the technically feasible option would be cost-effective.

### **Step 5 - Select BACT**

The facility's proposed option of using insulated tank, pressure/vacuum valve set within 10% of the maximum allowable working pressure of the tank, "gas tight" tank operation and maintaining a continuous storage temperature of 75°F (or less) within 60 days of completion of fermentation would be the BACT for wine storage tanks.

Appendix III  
Compliance Certification



TRINCHERO

*Family Estates*

Dennis Roberts  
San Joaquin Valley Air Pollution Control District  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244

June 14, 2013

Dear Dennis

This is to certify that emission units at all facilities operated by Trincher Family Estates/Sutter Home Winery are in compliance or are on a schedule for compliance with emission standards as set forth by the governing local regulatory authority for the California region in which they are located.

If you have any questions about this please do not hesitate to ask.

Sincerely,

Eric Jenssen  
Vice President – Engineering  
Trincher Family Estates  
Sutter Home Winery

CC: Jim Huntsinger, SVP-Production  
Dave Henry, Sr. Prod. Admin.

SUTTER HOME WINERY, INC.

POST OFFICE BOX 248 • ST. HELENA • CALIFORNIA • 94574-0248 • 707.963.3104

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

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME :Sutter Home Winery	FACILITY ID: N-7855
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: Trincherro Family	
3. Agent to the Owner: David Henry	

**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

June 14, 2013  
\_\_\_\_\_  
Date

David Henry  
\_\_\_\_\_  
Name of Responsible Official (please print)

Senior Production Administrator  
\_\_\_\_\_  
Title of Responsible Official (please print)

Appendix IV  
Federal Major Modification Calculations

## Federal Major Modification Calculations

Tanks operating in a winery are not truly independent emissions units. Therefore, the potential annual emissions must be established with consideration of all the other associated tanks in the facility. The potential to emit from the new tanks (PE<sub>2N</sub>) is therefore determined as the difference between the post project and the pre project potential emissions from the wine production operation based on the collective physical capacity of the processing equipment at the facility.

### **1. Potential to Emit (existing tanks)**

The potential annual VOCs from fermentation and storage operations at this winery are determined as follows:

#### White Wine Fermentation

White wine production capacity is determined as the lesser of the production capacities of either the crushing or pressing equipment or wine fermentation tanks at the facility:

$W_W$  = White wine production capacity (gallons per year as measured immediately after pressing) is the lesser of the following calculations:

$$\begin{aligned} W1 &= C \times D_w \times M \text{ (limited by crusher capacity)} \\ W2 &= P \times D_w \times M \text{ (limited by pressing capacity)} \\ W3 &= (V_{FW} \times F_W \times D_w) / W_{FW} \text{ (limited by white fermenter volume)} \\ W4 &= (V_T \times D_w) / R_{TW} \text{ (limited by overall tank processing)} \end{aligned}$$

Where,

$$\begin{aligned} C &= \text{grape crushing capacity} \\ &= 5,760 \text{ tons/day (Source: Project N-1103868)} \\ D_w &= \text{days in a white wine crush season} \\ &= 120 \text{ days (Source: Project N-1103868)} \\ M &= \text{amount of juice produced per ton of grapes crushed} \\ &= 200 \text{ gal/ton (Source: Project N-1103868)} \\ F_W &= \text{White wine fill factor} \\ &= 0.95 \text{ (Source: Project N-1103868)} \\ P &= \text{pressing capacity} \\ &= 5,400 \text{ tons/day (Source: Project N-1103868)} \\ W_{FW} &= \text{white fermentation period} \\ &= 10 \text{ days (Source: Project N-1103868)} \\ R_{TW} &= \text{total winery retention time for white wine} \\ &= 40 + 10 \\ &= 50 \text{ days (Source: Project N-1103868)} \\ V_{FW} &= \text{total volume of white wine fermenters} \end{aligned}$$

= 40,416,692 gal (Source: Projects N-1103868, N-1110296, and N-1120343)

$V_T$  = total winery cooperage  
= 48,834,692 gal (Source: Projects N-1103868, N-1110296, and N-1120343)

Using the above parameters,

W1 = 138.2 MG/year  
W2 = 129.6 MG/year  
W3 = 460.8 MG/year  
W4 = 117.2 MG/year  
 $W_W$  = W4 (lesser of W1, W2, W3, W4)  
= 117.2 MG/year

The potential white wine fermentation emissions would be:

$$PE1_{white} = E_{fw} \times W_W$$

Where:

$E_{fw}$  = white wine emission factor annual basis  
= 2.5 lb-VOC/1,000 gal (Source: District FYI-114)

$$PE1_{white} = (2.5 \text{ lb-VOC/1,000 gal}) \times (117.2 \times 10^6 \text{ gal/yr}) \\ = 293,000 \text{ lb-VOC/year}$$

#### White Wine Storage Emissions:

Storage emissions are calculated as follows:

$$PE1_{white} = E_s \times T \times W_w$$

Where,

$E_s$  = 0.213 lb-VOC/1,000 gal, per District FYI-114 for 23.9% alcohol by volume (rounded to 24% for calculation purposes), all existing storage tanks are permitted to store up to 23.9% alcohol by volume

T = total post fermentation inter-tank transfers per batch of wine  
= 8

$W_w$  = 117.2 MG/year (determined above)

$$PE1_{white} = (0.213 \text{ lb-VOC/1,000 gal}) \times (8) \times (117.2 \times 10^6 \text{ gal/year}) \\ = 199,709 \text{ lb-VOC/year}$$

Total PE for White Wine Production:

Potential emissions from 100% white wine production scenario are then determined as follows:

$$\begin{aligned} PE1_{\text{white}} &= PE1_{\text{white fermentation}} + PE1_{\text{white storage}} \\ &= 293,000 \text{ lb-VOC/year} + 199,709 \text{ lb-VOC/year} \\ &= 492,709 \text{ lb-VOC/year} \end{aligned}$$

Red Wine Fermentation Emissions:

Red wine production capacity is determined as the lesser of the production capacities of either the crushing, pressing or tank capacity.

$W_R$  = Red wine production capacity (gallons per year as measured immediately after pressing) and is the lesser of the following four calculations:

$$\begin{aligned} W1 &= C \times D_r \times M \text{ (limited by crusher capacity)} \\ W2 &= P \times D_r \times M \text{ (limited by pressing capacity)} \\ W3 &= (V_{FR} \times F \times D_r) / R_{FR} \text{ (limited by red fermenter volume)} \\ W4 &= (V_T \times D_r) / R_{TS} \text{ (limited by overall tank processing)} \end{aligned}$$

Where,

$$\begin{aligned} C &= \text{grape crushing capacity} \\ &= 5,760 \text{ tons/day (Source: Project N-1103868)} \\ D_r &= \text{days in a red wine crush season} \\ &= 120 \text{ days (Source: Project N-1103868)} \\ F &= \text{Fill factor for red wine fermentation} \\ &= 80\% \text{ (Source: Project N-1103868)} \\ M &= \text{amount of juice produced per ton of grapes crushed} \\ &= 200 \text{ gal/ton (Source: Project N-1103868)} \\ P &= \text{pressing capacity} \\ &= 5,400 \text{ tons/day (Source: Project N-1103868)} \\ R_{FR} &= \text{red fermentation period} \\ &= 5 \text{ days (Source: Project N-1103868)} \\ R_{TS} &= \text{total winery retention time for red wine,} \\ &= 40 + 5 \\ &= 45 \text{ days (Source: Project N-1103868)} \\ V_{FR} &= \text{total volume of red wine fermenters} \\ &= 1,874,520 \text{ gal (Source: Project N-1103868)} \\ V_T &= \text{total winery cooperage} \\ &= 48,834,692 \text{ gal (Source: Projects N-1103868, N-1110296, and N-1120343)} \end{aligned}$$

Using the above parameters,

$$W1 = 138.2 \text{ MG/year}$$

$$W2 = 129.6 \text{ MG/year}$$

$$W3 = 36.0 \text{ MG/year}$$

$$W4 = 130.2 \text{ MG/year}$$

$$W_R = W3 \text{ (lesser of } W1, W2, W3, W4) \\ = 36.0 \text{ MG/year}$$

The potential red wine fermentation emissions would be:

$$PE_{1_{\text{red}}} = E_{\text{fr}} \times W_R$$

Where,

$$E_{\text{fr}} = \text{red wine emission factor} \\ = 6.2 \text{ lb-VOC/1,000 gal (District Rule 4694)}$$

$$PE_{1_{\text{red}}} = (6.2 \text{ lb-VOC/1,000 gal}) \times (36.0 \times 10^6 \text{ gal/yr}) \\ = 223,200 \text{ lb-VOC/year}$$

#### Red Wine Storage Emissions:

Storage emissions are calculated as follows:

$$PE_{1_{\text{red}}} = E_s \times T \times W_R$$

Where:

$$E_s = 0.213 \text{ lb-VOC/1,000 gal, per District FYI-114 for 23.9\% alcohol by volume (rounded to 24\% for calculation purposes), all existing storage tanks are permitted to store up to 23.9\% alcohol by volume}$$

$$T = \text{total post fermentation inter-tank transfers per batch of wine} \\ = 8$$

$$W_R = 36.0 \text{ MG/year (determined above)}$$

$$PE_{1_{\text{red}}} = (0.213 \text{ lb-VOC/1,000 gal}) \times (8) \times (36.0 \times 10^6 \text{ gal/yr}) \\ = 61,344 \text{ lb-VOC/year}$$

#### Total PE for Red Wine Production:

Potential emissions from 100% red wine production scenario are then determined as follows:

$$PE_{1_{\text{red}}} = PE_{1_{\text{red}} \text{ fermentation}} + PE_{1_{\text{red}} \text{ storage}} \\ = 223,200 \text{ lb-VOC/year} + 61,344 \text{ lb-VOC/year}$$

= 284,544 lb-VOC/year

Summary:

The facility's emissions potential for fermentation and storage operations is then taken to be the greater of the white or red emissions potential determined above.

PE1 = greater of PE1<sub>white</sub> and PE1<sub>red</sub>  
= **492,709 lb-VOC/year**

**2. Potential to Emit (existing plus new tanks)**

The potential annual VOCs from fermentation and storage operations at this winery are determined as follows:

White Wine Fermentation

White wine production capacity is determined as the lesser of the production capacities of either the crushing or pressing equipment or wine fermentation tanks at the facility:

W<sub>W</sub> = White wine production capacity (gallons per year as measured immediately after pressing) is the lesser of the following three calculations:

W1 =  $C \times D_w \times M$  (limited by crusher capacity)  
W2 =  $P \times D_w \times M$  (limited by pressing capacity)  
W3 =  $(V_{FW} \times F_w \times D_w) / W_{FW}$  (limited by white fermenter volume)  
W4 =  $(V_T \times D_w) / R_{TW}$  (limited by overall tank processing)

Where,

C = grape crushing capacity  
= 5,760 tons/day  
D<sub>w</sub> = days in a white wine crush season  
= 120 days  
M = amount of juice produced per ton of grapes crushed  
= 200 gal/ton  
F<sub>w</sub> = White wine fill factor  
= 0.95  
P = pressing capacity  
= 5,400 tons/day  
W<sub>FW</sub> = white fermentation period  
= 10 days  
R<sub>TW</sub> = total winery retention time for white wine  
= 40 + 10  
= 50 days

$$\begin{aligned}V_{FW} &= \text{total volume of white wine fermenters} \\ &= 40,416,692 \text{ (the current project does not add any fermentation tanks)} \\ V_T &= \text{total winery cooperage} \\ &= 48,834,692 + 2,710,000 = 51,544,692 \text{ gal}\end{aligned}$$

Using the above parameters,

$$\begin{aligned}W1 &= 138.24 \text{ MG/year} \\ W2 &= 129.6 \text{ MG/year} \\ W3 &= 460.8 \text{ MG/year} \\ W4 &= 123.7 \text{ MG/year} \\ W_W &= W4 \text{ (lesser of } W1, W2, W3, W4) \\ &= 123.7 \text{ MG/year}\end{aligned}$$

The potential white wine fermentation emissions would be:

$$PE2_{\text{white}} = E_{fw} \times W_W$$

Where:

$$\begin{aligned}E_{fw} &= \text{white wine emission factor} \\ &= 2.5 \text{ lb-VOC/1,000 gal (Source: District FYI-114)}\end{aligned}$$

$$\begin{aligned}PE2_{\text{white}} &= (2.5 \text{ lb-VOC/1,000 gal}) \times (123.7 \times 10^6 \text{ gal/yr}) \\ &= 309,250 \text{ lb-VOC/year}\end{aligned}$$

#### White Wine Storage Emissions:

Storage emissions are calculated as follows:

$$PE2_{\text{white}} = E_s \times T \times W_w$$

Where,

$$\begin{aligned}E_s &= 0.213 \text{ lb-VOC/1,000 gal, per District FYI-114 for 23.9\% alcohol by volume (Rounded to} \\ &\text{24\% for calculation purposes), all existing and new storage tanks are permitted to store up} \\ &\text{to 23.9\% alcohol by volume}\end{aligned}$$

$$\begin{aligned}T &= \text{total post fermentation inter-tank transfers per batch of wine} \\ &= 8\end{aligned}$$

$$W_w = 123.7 \text{ MG/year (determined above)}$$

$$\begin{aligned}PE2_{\text{white}} &= (0.213 \text{ lb-VOC/1,000 gal}) \times (8) \times 123.7 \times 10^6 \text{ gal/year} \\ &= 210,785 \text{ lb-VOC/year}\end{aligned}$$

Total PE for White Wine Production:

Potential emissions from 100% white wine production scenario are then determined as follows:

$$\begin{aligned} PE_{2\text{white}} &= PE_{2\text{white fermentation}} + PE_{2\text{white storage}} \\ &= 309,250 \text{ lb-VOC/year} + 210,785 \text{ lb-VOC/year} \\ &= 520,035 \text{ lb-VOC/year} \end{aligned}$$

Red Wine Fermentation Emissions:

Red wine production capacity is determined as the lesser of the production capacities of either the crushing, pressing or tank capacity.

$W_R$  = Red wine production capacity (gallons per year as measured immediately after pressing) and is the lesser of the following four calculations:

$$\begin{aligned} W1 &= C \times D_r \times M \text{ (limited by crusher capacity)} \\ W2 &= P \times D_r \times M \text{ (limited by pressing capacity)} \\ W3 &= (V_{FR} \times F \times D_r) / R_{FR} \text{ (limited by red fermenter volume)} \\ W4 &= (V_T \times D_r) / R_{TS} \text{ (limited by overall tank processing)} \end{aligned}$$

Where,

$$\begin{aligned} C &= \text{grape crushing capacity} \\ &= 5,760 \text{ tons/day} \\ D_r &= \text{days in a red wine crush season} \\ &= 120 \text{ days} \\ F &= \text{Fill factor for red wine fermentation} \\ &= 80\% \\ M &= \text{amount of juice produced per ton of grapes crushed} \\ &= 200 \text{ gal/ton} \\ P &= \text{pressing capacity} \\ &= 5,400 \text{ tons/day} \\ R_{FR} &= \text{red fermentation period} \\ &= 5 \text{ days} \\ R_{TS} &= \text{total winery retention time for red wine,} \\ &= 40 + 5 \\ &= 45 \text{ days} \\ V_{FR} &= \text{total volume of red wine fermenters} \\ &= 1,874,520 \text{ gal} \\ V_T &= \text{total winery cooperage} \\ &= 48,834,692 + 2,710,000 = 51,544,692 \text{ gal} \end{aligned}$$

$$W1 = 138.2 \text{ MG/year}$$

$$W2 = 129.6 \text{ MG/year}$$

$$\begin{aligned}W3 &= 36.0 \text{ MG/year} \\W4 &= 137.5 \text{ MG/year} \\W_R &= W3 \text{ (lesser of } W1, W2, W3, W4) \\ &= 36.0 \text{ MG/year}\end{aligned}$$

The potential red wine fermentation emissions would be:

$$PE2_{\text{red}} = E_{\text{fr}} \times W_R$$

Where,

$$\begin{aligned}E_{\text{fr}} &= \text{red wine emission factor} \\ &= 6.2 \text{ lb-VOC/1,000 gal (District Rule 4694)}\end{aligned}$$

$$\begin{aligned}PE2_{\text{red}} &= (6.2 \text{ lb-VOC/1,000 gal}) \times (36.0 \times 10^6 \text{ gal/yr}) \\ &= 223,200 \text{ lb-VOC/year}\end{aligned}$$

#### Red Wine Storage Emissions:

Storage emissions are calculated as follows:

$$PE2_{\text{red}} = E_s \times T \times W_R$$

Where:

$$E_s = 0.213 \text{ lb-VOC/1,000 gal, per District FYI-114 for 23.9\% alcohol by volume (rounded to 24\% for calculation purposes), all existing storage tanks are permitted to store up to 23.9\% alcohol by volume}$$

$$\begin{aligned}T &= \text{total post fermentation inter-tank transfers per batch of wine} \\ &= 8\end{aligned}$$

$$W_R = 36.0 \text{ MG/year (determined above)}$$

$$\begin{aligned}PE2_{\text{red}} &= (0.213 \text{ lb-VOC/1,000 gal}) \times (8) \times (36.0 \times 10^6 \text{ gal/yr}) \\ &= 61,344 \text{ lb-VOC/year}\end{aligned}$$

#### Total PE for Red Wine Production:

Potential emissions from 100% red wine production scenario are then determined as follows:

$$\begin{aligned}PE2_{\text{red}} &= PE2_{\text{red fermentation}} + PE2_{\text{red storage}} \\ &= 223,200 \text{ lb-VOC/year} + 61,344 \text{ lb-VOC/year} \\ &= 284,544 \text{ lb-VOC/year}\end{aligned}$$

Summary:

The facility's emissions potential for fermentation and storage operations is then taken to be the greater of the white or red emissions potential determined above.

PE2 = greater of PE2<sub>white</sub> and PE2<sub>red</sub>  
 = **520,035 lb-VOC/year**

**3. Net Emissions Increase**

<b>Net Emissions Increase Based on Physical Capacity of Wine Processing Equipment</b>			
<b>Category</b>	<b>Fermentation</b>	<b>Storage</b>	<b>Total</b>
PE2	309,250	210,785	520,035
PE1	293,000	199,709	492,709
Net Emissions Increase	16,250	11,076	27,326

Appendix V  
Quarterly Net Emissions Change Calculations

## Quarterly Net Emissions Change Calculations

For the purposes of this project,

$$\text{QNEC} = (\text{PE2}_{\text{SLC}} - \text{BE}_{\text{SLC}}) \div 4$$

As shown in Section VII.C.5, BE is equal to PE1 for all pollutants. Therefore, the equation for QNEC reduces to:

$$\text{QNEC} = (\text{PE2}_{\text{SLC}} - \text{PE1}_{\text{SLC}}) \div 4$$

The applicant did not propose any changes to the VOC SLC for this project. Therefore,  $\text{PE2}_{\text{SLC}}$  is equal to  $\text{PE1}_{\text{SLC}}$ .

Thus, QNEC is equal to zero for each unit.