



JUL 25 2012

Phil Castro
E&J Gallo Winery
5610 E. Olive Avenue
Fresno, CA 93727

Re: Notice of Minor Title V Permit Modification
District Facility # C-447
Project # C-1121310

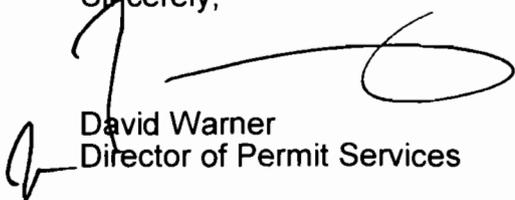
Dear Mr. Castro:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct C-447-267-0 into the Title V operating permit. Proposed permit unit C-447-267-0 is a new emergency fire water pump driven by a diesel engine

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct C-447-267-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,



David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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



JUL 25 2012

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

Re: **Notice of Minor Title V Permit Modification**
District Facility # C-447
Project # C-1121310

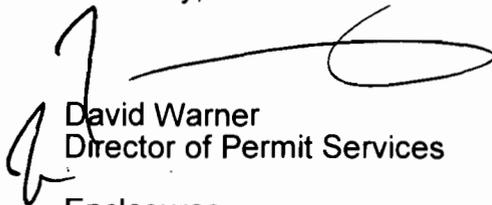
Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. E&J Gallo Winery is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct C-447-267-0 into the Title V operating permit. Proposed permit unit C-447-267-0 is a new emergency fire water pump driven by a diesel engine

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct C-447-267-0, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,



David Warner
Director of Permit Services

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1121310

Engineer: Dennis Roberts
Date: July 24, 2012

Facility Number: C-447
Facility Name: E&J Gallo Winery
Mailing Address: 5610 E. Olive Avenue
Fresno, CA 93727

Contact Name: Phil Castro
Phone: (559) 458-2588

Responsible Official: Phil Castro
Title: Plant Manager

I. PROPOSAL

E&J Gallo Winery is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct C-447-267-0 into the Title V operating permit. Proposed permit unit C-447-267-0 is a new emergency fire water pump driven by a diesel engine.

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

II. FACILITY LOCATION

5610 E. Olive Avenue
Fresno, CA 93727

III. EQUIPMENT DESCRIPTION

C-447-267-1: 125 BHP CUMMINS MODEL CFP5E-F30 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A FIREWATER PUMP

IV. SCOPE OF EPA AND PUBLIC REVIEW

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

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

E & J Gallo Winery is proposing to install a 125 bhp diesel-fired emergency standby internal combustion (IC) engine powering a firewater pump.

C-447-267-1:

- Conditions 2 and 5-17 of Authority to Construct appear as conditions 1-14 of the new Permits to Operate.
- Condition 1 of ATC has been deleted since it was satisfied by this project.
- Conditions 3 and 4 of the ATC have been deleted since these requirements appear as conditions 41 and 22 respectively on the facility-wide permit C-447-0-3.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

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

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

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

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

VIII. ATTACHMENTS

- A. Proposed Title V Operating Permit No. C-447-267-1
- B. Authority to Construct No. C-447-267-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Title V Operating Permit No.
C-447-267-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-447-267-1

EXPIRATION DATE: 06/30/2016

EQUIPMENT DESCRIPTION:

125 BHP CUMMINS MODEL CFP5E-F30 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE
POWERING A FIREWATER PUMP

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115 and 40 CFR Subpart IIII] Federally Enforceable Through Title V Permit
4. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
5. Emissions from this IC engine shall not exceed any of the following limits: 2.70 g-NO_x/bhp-hr, 0.67 g-CO/bhp-hr, or 0.14 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed 0.10 g-PM₁₀/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
7. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 60 Subpart IIII] Federally Enforceable Through Title V Permit
8. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
9. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
10. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit

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

11. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems", 1998 edition. Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rule 4702, 17 CCR 93115 and 40 CFR Part 60 Subpart IIII] Federally Enforceable Through Title V Permit
12. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115]
13. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
14. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authority to Construct No.
C-447-267-0



AUTHORITY TO CONSTRUCT

PERMIT NO: C-447-267-0

ISSUANCE DATE: 07/15/2010

LEGAL OWNER OR OPERATOR: E & J GALLO WINERY
MAILING ADDRESS: 5610 E OLIVE AVE
FRESNO, CA 93727

LOCATION: 5610 E OLIVE AVE
FRESNO, CA 93727

EQUIPMENT DESCRIPTION:
125 BHP CUMMINS MODEL CFP5E-F30 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE
POWERING A FIREWATER PUMP

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101].
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
6. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115 and 40 CFR Subpart IIII]
7. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, 17 CCR 93115, 40 CFR Part 60 Subpart IIII]
8. Emissions from this IC engine shall not exceed any of the following limits: 2.70 g-NOx/bhp-hr, 0.67 g-CO/bhp-hr, or 0.14 g-VOC/bhp-hr. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]
9. Emissions from this IC engine shall not exceed 0.10 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rule 2201, 17 CCR 93115, and 40 CFR Part 60 Subpart IIII]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

C-447-267-0; Jul 15 2010 11:30AM - GARCIAJ; Joint Inspection NOT Required

10. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 60 Subpart IIII]
11. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702]
12. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702]
13. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702]
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15. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702]
16. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 17 CCR 93115]
17. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115]

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-447-267-1	74	4	18	0	3
TOTAL	74	4	18	0	3

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED

MAY 25 2012

Permit Application For:

**Permits Services
SJVAPCD**

- AUTHORITY TO CONSTRUCT (ATC) - New Emission Unit
- AUTHORITY TO CONSTRUCT (ATC) - Modification Of Emission Unit With Valid PTO/Valid ATC
- AUTHORITY TO CONSTRUCT (ATC) - Renewal of Valid Authority to Construct
- PERMIT TO OPERATE (PTO) - Existing Emission Unit Now Requiring a Permit to Operate

1. PERMIT TO BE ISSUED TO: E&J Gallo Winery-Fresno	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>5610 E. Olive Avenue</u> CITY: <u>Fresno</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93727</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>same as above</u> CITY: _____ _____/4 SECTION _____ TOWNSHIP _____ RANGE _____	WITHIN 1,000 FT OF A SCHOOL? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO S.I.C. CODE(S) OF FACILITY (If known): _____
4. GENERAL NATURE OF BUSINESS: Production of wine, brandy and concentrates	INSTALL DATE: Minor Permit Modification Application – Submitted to District Prior to Pre-Startup Inspection
5. TITLE V PERMIT HOLDERS ONLY: Do you request a COC (EPA Review) prior to receiving your ATC (If yes, please complete and attach a Compliance Certification form (TVFORM-009)? Requesting Minor Modification Permit NA <input type="checkbox"/> YES <input type="checkbox"/> NO	
6. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Request minor modification permit application for C-447-267 for the emergency diesel engine. The application is submitted prior to the District pre startup inspection.	
7. PERMIT REVIEW PERIOD: Do you request a three- or ten-day period to review the draft Authority to Construct permit? Please note that checking "YES" will delay issuance of your final permit by a corresponding number of working days. See instructions for more information on this review process. <input type="checkbox"/> 3-day review <input type="checkbox"/> 10-day review <input checked="" type="checkbox"/> No review requested	
8. HAVE YOU EVER APPLIED FOR AN ATC OR PTO IN THE PAST? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO If yes, ATC/PTO #: <u>C-447</u>	Optional Section 11. DO YOU WANT TO PARTICIPATE IN EITHER OF THE FOLLOWING VOLUNTARY PROGRAMS: "HEALTHY AIR LIVING (HAL)" <input type="checkbox"/> Yes, please send info "INSPECT" <input type="checkbox"/> Yes, please send info  
9. IS THIS APPLICATION FOR THE CONSTRUCTION OF A NEW FACILITY? (If "Yes" is checked, please complete the CEQA Information form) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
10. IS THIS APPLICATION SUBMITTED AS THE RESULT OF EITHER A NOTICE OF VIOLATION OR A NOTICE TO COMPLY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If yes, NOV/NTC #: _____	
12. TYPE OR PRINT NAME OF APPLICANT: Mr. Phil Castro	TITLE OF APPLICANT: Plant Manager-Fresno Winery
13. SIGNATURE OF APPLICANT: 	DATE: 05/24/12 <u>5/24/12</u>
	PHONE #: (559) 458-2588 FAX #: E-MAIL: phil.castro@ejgallo.com

FOR APCD USE ONLY:

DATE STAMP:	FILING FEE RECEIVED: \$ _____ CHECK #: _____ DATE PAID: _____ PROJECT #: <u>C-1121310</u> FACILITY ID: <u>C-447</u>
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**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

SIGNIFICANT PERMIT MODIFICATION
 MINOR PERMIT MODIFICATION

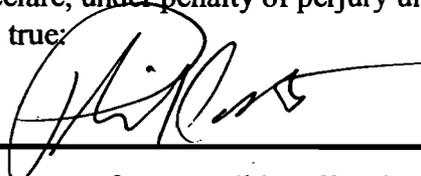
ADMINISTRATIVE
AMENDMENT

COMPANY NAME: E&J Gallo Winery - Fresno	FACILITY ID C -447
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: E&J Gallo Winery-Fresno	
3. Agent to the Owner: Mr. Phil Castro	

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

05/24/12

Date

Mr. Phil Castro

Name of Responsible Official (please print)

Plant Manager – Fresno Winery

Title of Responsible Official (please print)