



SEP 30 2013

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

Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # C-447
Project # C-1132501

Dear Mr. Castro:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. E & J Gallo requests to add permit unit C-447-295 to the permit units in the equipment description of C-447-226 allowed to receive biogas.

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

If you have any questions, please contact Mr. 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: 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

San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Non-NSR Modification

Facility Name:	E & J Gallo Winery	Date:	September 12, 2013
Mailing Address:	5610 E. Olive Ave Fresno, CA 93727	Engineer:	Juscelino Siongco
Contact Person:	Phil Castro	Lead Engineer:	Martin Keast
Telephone:	(559) 458-2588		
E-Mail:	phil.castro@ejgallo.com		
Application #(s):	C-447-226-10		
Project #:	C-1132501		
Deemed Complete:	August 28, 2013		

I. Proposal

E & J Gallo requests an Authority to Construct (ATC) application to add permit unit C-447-295 to the permit units in the equipment description of C-447-226 allowed to receive biogas.

Since permit unit C-447-295 is currently authorized to combust biogas, the addition of this permit unit in the equipment description of C-447-226 with permit units allowed to utilize biogas does not result in a change to permit conditions or method of operation. As indicated in section VIII below, the proposed modification does not constitute an NSR modification to unit C-447-226-10. Therefore, this project is not subject to District Rule 2201 and no calculations will be performed at this time.

See Appendix C for ATC C-447-295-0.

E & J Gallo received their Title V Permit on December 12, 1997. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. E & J Gallo must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (4/21/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4311	Flares (6/18/09)
Rule 4801	Sulfur Compounds (12/17/92)

CH&SC 41700 Health Risk Assessment
CH&SC 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 5610 E. Olive Ave in Fresno, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Wastewater sources at the facilities are: winery and grape concentrate plant process water, byproducts from brandy distillation (stillage), and grape receiving area wash water.

The grape receiving area wash water will be screened to reduce solids, then pumped to the pre-acidification tank with the other wastewater streams. In the pre-acidification tank, potassium hydroxide will be added to maintain a pH between 6.5 and 8.5; nutrients and alkalinity will also be added as needed.

The recycle tank will receive blended wastewater from the pre-acidification tank. Effluent from the anaerobic digester will also flow to the recycle tank to be mixed with the incoming wastewater. Surplus effluent from the anaerobic reactor will overflow the standpipe into the sulfide oxidation tank.

The anaerobic treatment tanks will receive blended wastewater and recycled effluent. One smaller anaerobic treatment tank will operate year-round while the larger tank will operate during periods of peak flow. Wastewater will enter the bottom of the tank in the primary chamber. The wastewater will flow upwards through the primary chamber through a granular sludge bed. Anaerobic bacteria on the granules will metabolize the organic material in the wastewater producing biogas – which consists mostly of methane and carbon dioxide with some hydrogen sulfide – and biomass sludge. The biogas will rise to the top of the primary chamber to be collected. The wastewater will rise up to the bottom of the secondary chamber. In the secondary chamber biomass sludge will settle back into the primary chamber and the anaerobic reactor effluent will flow back to the recycle tank. Sludge will be removed from the bottom of the primary chamber and pumped to tanker trucks for disposal or sale.

The sulfide oxidation tank will receive anaerobic reactor effluent overflow from the recycle tank and the bleed stream from the biological reactor serving the biogas scrubber. The effluent, containing H₂S and with low oxygen content, will enter the bottom of the sulfide oxidation tank. Compressed air will be pumped into the bottom of the tank through fine bubble diffusers. The effluent will absorb oxygen from the air which will oxidize the sulfide to aqueous sulfate. Trace amounts of H₂S may be present in the exhaust from the top of the sulfide oxidation tank.

The oxidized effluent from the sulfide oxidation tank will flow to the sanitary sewer and eventually to the city WWTP plant. A portion of the effluent will be applied to Gallo's adjoining farmland as irrigation water.

Biogas from the primary chambers of the anaerobic treatment tanks will be compressed and sent to the biogas scrubber to remove H₂S. From the scrubber the biogas is sent to three winery boilers (C-447-1, -2, and -3). With this project, permit unit C-447-295 will be included in the list of units allowed to receive biogas since it is already permitted to receive biogas. If the boilers are not operating, or during process upsets the biogas will be sent to the ground level enclosed flare.

V. Equipment Listing

Pre-Project Equipment Description:

C-447-226-9: 175,320 GALLON WINERY WASTEWATER ANAEROBIC REACTOR SERVED BY A BIOGAS SCRUBBING SYSTEM SHARED WITH C-447-227 AND VENTED TO AN ENCLOSED 39.4 MMBTU/HR VAREC 244EGF FLARE OR BOILERS C-447-1, -2 OR -3, AND 502,000 GALLON WINERY WASTEWATER SULFIDE OXIDATION TANK

Proposed Modification:

Allow routing of biogas to permit unit C-447-295.

C-447-226-10: MODIFICATION OF 175,320 GALLON WINERY WASTEWATER ANAEROBIC REACTOR SERVED BY A BIOGAS SCRUBBING SYSTEM SHARED WITH C-447-227 AND VENTED TO AN ENCLOSED 39.4 MMBTU/HR VAREC 244EGF FLARE OR BOILERS C-447-1, -2 OR -3, AND 502,000 GALLON WINERY WASTEWATER SULFIDE OXIDATION TANK: ALLOW ROUTING OF BIOGAS TO PERMIT UNIT C-447-295

Post Project Equipment Description:

C-447-226-10: 175,320 GALLON WINERY WASTEWATER ANAEROBIC REACTOR SERVED BY A BIOGAS SCRUBBING SYSTEM SHARED WITH C-447-227 AND VENTED TO AN ENCLOSED 39.4 MMBTU/HR VAREC 244EGF FLARE OR BOILERS C-447-1, -2, -3, OR -295, AND 502,000 GALLON WINERY WASTEWATER SULFIDE OXIDATION TANK

VI. Emission Control Technology Evaluation

There is no change to emission control technology of the proposed unit in this project, therefore no further discussion is required.

VII. General Calculations

This project does not meet the criteria for a Rule 2201 Modification, as defined in Section 3.26, and is not subject to the requirements of Rule 2201. Therefore, formal calculations for Rule 2201 are not necessary and no further discussion is required.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

As noted in Section VII of this engineering evaluation, the proposed modification does not constitute an NSR modification; Pursuant to section 3.25 of District Rule 2201, a modification is defined as:

- 3.25.1.1 Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.

The proposed modification does not result in a change in the hour of operation, production rate or method of operation which necessitates a change in permit conditions.

- 3.25.1.2 Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.

The proposed modification does not constitute a structural change or addition to an existing emissions unit which necessitates a change in permit conditions.

- 3.25.1.3 An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.

The proposed modification does not result in an increase in emissions from any emissions unit.

- 3.25.1.4 Addition of any new emissions unit which is subject to District permitting requirements.

The proposed modification does not result in the addition of any new emissions units.

- 3.25.1.5 A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

The proposed modification does not necessitate any change to permit conditions or description.

As discussed above, the modification proposed to unit C-447-226-10 does not meet any of the criteria for a modification. Therefore, it is not subject to the requirements of District Rule 2201.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, 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.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment/minor modification application.

Rule 4001 New Source Performance Standards (NSPS)

This rule incorporates the New Source Performance Standards from Part 60, Chapter 1, Title 40, Code of Federal Regulations. All new sources of air pollution and modification of existing sources of air pollution shall comply with the standards, criteria, and requirements set forth therein.

No newly constructed, reconstructed or modified affected facilities are proposed in this project. Therefore, the requirements of this Rule do not apply to this proposal.

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 waste water anaerobic reactor operations.

Rule 4101 Visible Emissions

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity).

Visible emissions are not expected from the wastewater treatment operation.

The enclosed ground-level flare is designed to operate with no visible flame. Emissions from the flare are not expected to exceed Ringelmann 1 or 20% opacity.

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

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.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

For the flare:

$$0.008 \frac{lb}{MMBtu} \times \frac{MMBtu}{8872dscf} \times \frac{7000grain}{lb} = 0.006 \frac{grain}{dscf}$$

Since 0.006 grain/dscf is less than 0.1 grain/dscf. Therefore, compliance with this rule is expected.

The following condition is included on the ATC:

- {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

Rule 4301 Fuel Burning Equipment

This rule specifies maximum emission rates in lb/hr for SO₂, NO₂, and combustion contaminants (defined as total PM in Rule 1020). This rule also limits combustion contaminants to ≤ 0.1 gr/scf. According to AP 42 (Table 1.4-2, footnote c), all PM emissions from natural gas combustion are less than 1 μm in diameter.

District Rule 4301 Limits			
Pollutant	NO ₂	Total PM	SO ₂
ATC #C-447-226-10 (lb/hr)	0.8 ¹	0.2 ¹	0.1 ¹
Rule Limit (lb/hr)	140	10	200

The above table indicates compliance with the maximum lb/hr emissions in this rule by comparing the permitted emissions of the permit unit modified by this project for each criteria pollutant; therefore, continued compliance is expected.

District Rule 4801 Sulfur Compounds

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2% by volume calculated as SO₂, on a dry basis averaged over 15 consecutive minutes.

C-447-226-10:

H₂S emissions from the biofilter and sulfide oxidation tank will all be 5 ppmv or less; therefore emissions from these units will not exceed the rule limit of 2000 ppmv (0.2%).

Therefore, compliance with District Rule 4801 requirements is expected.

Rule 4311 Flares

ATC C-447-226-10:

This rule applies to operations involving the use of flares. Therefore the operation of the anaerobic digester served by a flare is subject to the rule.

Section 5.1 applies to flares that are only permitted to operate during an emergency. Since the proposed flare is not limited to operating only in an emergency, Section 5.1 does not apply.

Section 5.2 requires that a flame be present at all times when combustible gases are vented through the flare.

¹ From Project C-1091102

- A flame shall be present in the flare at all times when combustible gases are vented through the flare. [Rule 4311]

Section 5.3 requires the outlet be equipped with an automatic ignition system, or shall operate with a pilot flame present at all times when combustible gases are vented through the flare. The flare uses a continuous pilot flame.

- The flare shall be operating with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods. [Rule 4311]

Section 5.4 requires that a heat sensing device such as a thermocouple capable of continuously detecting at least one pilot flame or the flare flame be installed or operated. The flare is equipped with a thermocouple to detect the pilot flame.

- The flare shall be equipped with a thermocouple capable of continuously detecting if the pilot flame is present. [Rule 4311]

Section 5.5 requires that flares that use flow-sensing automatic ignition systems and which do not use a continuous pilot flame shall use purge gas for purging. The flare uses a continuous pilot flame, therefore Section 5.5 does not apply.

Section 5.6 applies to open flares. This flare is an enclosed flare, therefore Section 5.6 does not apply.

Section 5.7 establishes emission limits for ground level enclosed flares. The emission limits for flares rated between 10 and 100 MMBtu/hr which do not use steam assist are 0.0027 lb VOC/MMBtu and 0.1330 lb NO_x/MMBtu. The flare has emission limits of 0.002 lb VOC/MMBtu and 0.06 lb NO_x/MMBtu. Therefore compliance with the emission limits of this rule is expected.

Section 6.1.2 requires source testing at least once every 12 months to demonstrate compliance with Section 5.7

- Source testing to measure NO_x and VOC emissions from the flare shall be conducted at least once every twelve (12) months. [District Rule 4311]
- {110} The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]

Section 6.2 requires records of the source test results be maintained, retained on-site for a minimum of five years and made available to the APCO, ARB, and US EPA upon request.

- The results of each source test shall be maintained, retained on-site for a minimum of five years and made available upon request. [District Rule 4311]

Section 6.3 establishes the required test methods for the source test.

- The following test methods shall be used: VOC – EPA Method 25, except when the outlet concentration must be below 50 ppm to meet the standard, in which case Method 25a may

be used; halogenated exempt compounds – EPA Method 18 or ARB Method 422; NO_x (lb/MMBtu) – EPA Method 19; NO_x and O₂ (concentrations) – EPA Method 3A, EPA Method 7E, or ARB 100. [District Rule 4311]

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

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 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; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15301 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful 45-day EPA comment period, issue ATC C-447-226-10 subject to the permit conditions on the attached draft ATC in Appendix A.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
C-447-226-10	3020-02-H	39,400 kBtu/hr	\$1,030.00

Appendixes

- A: Draft ATC
- B: Current PTO
- C: ATC C-447-295-0
- D: Compliance Certification

APPENDIX A
Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-447-226-10

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:

MODIFICATION OF 175,320 GALLON WINERY WASTEWATER ANAEROBIC REACTOR SERVED BY A BIOGAS SCRUBBING SYSTEM SHARED WITH C-447-227 AND VENTED TO AN ENCLOSED 39.4 MMBTU/HR VAREC 244EGF FLARE OR BOILERS C-447-1, -2 OR -3, AND 502,000 GALLON WINERY WASTEWATER SULFIDE OXIDATION TANK: AUTHORIZE ROUTING OF BIOGAS TO PERMIT UNIT C-447-295

CONDITIONS

- {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
- {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
- The primary chamber of the anaerobic reactor shall be enclosed and vented to the biofilter listed on C-447-225. [District Rule 4102]
- Oxygen content of the effluent in the sulfide oxidation tank shall be maintained at a level sufficient to prevent nuisance odors. [District Rule 4102]
- Emission rates from the flare shall not exceed any of the following limits: NO_x (as NO₂) - 0.06 lb/MMBtu; VOC (as methane) - 0.002 lb/MMBtu; CO - 0.3 lb/MMBtu; or PM₁₀ - 0.008 lb/MMBtu. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
- The H₂S scrubber shall be in operation whenever biogas is produced in the anaerobic reactors. [District Rule 2201] Federally Enforceable Through Title V Permit

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-447-226-10 Sep 12 2013 3:16PM - SIONGCOU Joint Inspection NOT Required

7. H₂S content of the scrubbed biogas shall not exceed 50 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Biogas flow rate to the flare shall not exceed 481,900 scf per day. [District Rule 2201 and 4311, 5.10] Federally Enforceable Through Title V Permit
9. Biogas production shall not exceed any of the following: 1st quarter - 31,670,000 scf, 2nd quarter - 31,800,300 scf, 3rd quarter - 83,115,800 scf, 4th quarter 83,115,800 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
10. All flaring shall be conducted in accordance with the facility's approved flare minimization plan (FMP). [District Rule 4311] Federally Enforceable Through Title V Permit
11. A flame shall be present in the flare at all times when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
12. The outlet shall be equipped with an automatic ignition system, or, shall be operated with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311] Federally Enforceable Through Title V Permit
13. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311] Federally Enforceable Through Title V Permit
14. Source testing to measure NO_x and VOC emissions from the flare shall be conducted at least once every twelve (12) months. [District Rule 4311] Federally Enforceable Through Title V Permit
15. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
16. The following test methods shall be used: VOC - EPA Method 25, except when the outlet concentration must be below 50 ppm to meet the standard, in which case Method 25a may be used; exempt compounds - EPA Method 18 or ARB Method 422; NO_x (lb/MMBtu) - EPA Method 19; NO_x and O₂ (concentrations) - EPA Method 3A, EPA Method 7E, or ARB 100. [District Rule 4311] Federally Enforceable Through Title V Permit
17. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
18. H₂S content of the exhaust from the biological reactor serving the scrubber shall not exceed 1 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Residual dissolved oxygen level in the sulfide oxidation tank shall not fall below 1 milligram per liter. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
20. Permittee shall monitor the H₂S content of the biogas at the inlet and at the outlet of the scrubber on a weekly basis. If the outlet H₂S concentration does not exceed 50 ppmv for four consecutive weeks, monitoring may be conducted on a monthly basis. If the H₂S concentration at the outlet exceeds 50 ppmv, weekly monitoring shall resume. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Permittee shall monitor the residual dissolved oxygen content of the sulfide oxidation tank at least on a weekly basis. If the residual dissolved oxygen content does not fall below 1 mg/liter for four consecutive weeks, monitoring may be conducted on a monthly basis. If the concentration falls below 1 mg/liter, weekly monitoring shall resume. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
22. The residual dissolved oxygen content sensor for the sulfide oxidation tank shall be calibrated in accordance with the manufacturer's specifications. A copy of the user's manual or like document from the manufacturer shall be maintained onsite so that the District may verify calibration frequency and procedures. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

DRAFT

CONDITIONS CONTINUE ON NEXT PAGE

23. If the residual dissolved oxygen content in the sulfide oxidation tank falls below 1 mg/liter, the permittee shall immediately correct the system. If concentration falls below 1 mg/liter for more than 10 consecutive minutes, the permittee shall notify the District within the following 1 hour. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
24. The operator shall notify the APCO of an unplanned flaring event within 24 hours after the start of the next business day or within 24 hours of their discovery, which ever occurs first. The notification shall include the flare source identification, the start date and time, and the end date and time. [District Rule 4311] Federally Enforceable Through Title V Permit
25. The permittee shall maintain the following records: copies of annual source testing results; and a copy of the approved flare minimization plan. [District Rule 4311] Federally Enforceable Through Title V Permit
26. Permittee shall maintain a log of the residual dissolved oxygen content sensor calibrations, which shall include the date and time of each calibration and any corrective actions. The records shall be retained, maintained on-site for at least five years, and made available for District inspection upon request. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
27. Permittee shall maintain records of: (1) daily biogas production, (2) measured H₂S concentration in biogas, (3) date H₂S measurements taken from exhaust of biological reactor serving the scrubber, (4) measured concentration level of residual dissolved oxygen content taken from sulfide oxidation tank, and (5) date measurement of concentration level of residual dissolved oxygen content taken from sulfide oxidation tank. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
28. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit

DRAFT

APPENDIX B
Current PTO

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-447-226-9

EXPIRATION DATE: 06/30/2016

EQUIPMENT DESCRIPTION:

175,320 GALLON WINERY WASTEWATER ANAEROBIC REACTOR SERVED BY A BIOGAS SCRUBBING SYSTEM SHARED WITH C-447-227 AND VENTED TO AN ENCLOSED 39.4 MMBTU/HR VAREC 244EGF FLARE OR BOILERS C-447-1, -2 OR -3, AND 502,000 GALLON WINERY WASTEWATER SULFIDE OXIDATION TANK

PERMIT UNIT REQUIREMENTS

1. The primary chamber of the anaerobic reactor shall be enclosed and vented to the biofilter listed on C-447-225. [District Rule 4102]
2. Oxygen content of the effluent in the sulfide oxidation tank shall be maintained at a level sufficient to prevent nuisance odors. [District Rule 4102]
3. Emission rates from the flare shall not exceed any of the following limits: NO_x (as NO₂) - 0.06 lb/MMBtu; VOC (as methane) - 0.002 lb/MMBtu; CO - 0.3 lb/MMBtu; or PM₁₀ - 0.008 lb/MMBtu. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit
4. The H₂S scrubber shall be in operation whenever biogas is produced in the anaerobic reactors. [District Rule 2201] Federally Enforceable Through Title V Permit
5. H₂S content of the scrubbed biogas shall not exceed 50 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Biogas flow rate to the flare shall not exceed 481,900 scf per day. [District Rule 2201 and 4311, 5.10] Federally Enforceable Through Title V Permit
7. Biogas production shall not exceed any of the following: 1st quarter - 31,670,000 scf, 2nd quarter - 31,800,300 scf, 3rd quarter - 83,115,800 scf, 4th quarter 83,115,800 scf. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All flaring shall be conducted in accordance with the facility's approved flare minimization plan (FMP). [District Rule 4311] Federally Enforceable Through Title V Permit
9. A flame shall be present in the flare at all times when combustible gases are vented through the flare. [District Rule 4311] Federally Enforceable Through Title V Permit
10. The outlet shall be equipped with an automatic ignition system, or, shall be operated with a pilot flame present at all times when combustible gases are vented through the flare, except during purge periods for automatic-ignition equipped flares. [District Rule 4311] Federally Enforceable Through Title V Permit
11. Except for flares equipped with a flow-sensing ignition system, a heat sensing device such as a thermocouple, ultraviolet beam sensor, infrared sensor, or an equivalent device, capable of continuously detecting at least one pilot flame or the flare flame is present shall be installed and operated. [District Rule 4311] Federally Enforceable Through Title V Permit
12. Source testing to measure NO_x and VOC emissions from the flare shall be conducted at least once every twelve (12) months. [District Rule 4311] Federally Enforceable Through Title V Permit

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

13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
14. The following test methods shall be used: VOC - EPA Method 25, except when the outlet concentration must be below 50 ppm to meet the standard, in which case Method 25a may be used; exempt compounds - EPA Method 18 or ARB Method 422; NO_x (lb/MMBtu) - EPA Method 19; NO_x and O₂ (concentrations) - EPA Method 3A, EPA Method 7E, or ARB 100. [District Rule 4311] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. H₂S content of the exhaust from the biological reactor serving the scrubber shall not exceed 1 ppmv. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Residual dissolved oxygen level in the sulfide oxidation tank shall not fall below 1 milligram per liter. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
18. Permittee shall monitor the H₂S content of the biogas at the inlet and at the outlet of the scrubber on a weekly basis. If the outlet H₂S concentration does not exceed 50 ppmv for four consecutive weeks, monitoring may be conducted on a monthly basis. If the H₂S concentration at the outlet exceeds 50 ppmv, weekly monitoring shall resume. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Permittee shall monitor the residual dissolved oxygen content of the sulfide oxidation tank at least on a weekly basis. If the residual dissolved oxygen content does not fall below 1 mg/liter for four consecutive weeks, monitoring may be conducted on a monthly basis. If the concentration falls below 1 mg/liter, weekly monitoring shall resume. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
20. The residual dissolved oxygen content sensor for the sulfide oxidation tank shall be calibrated in accordance with the manufacturer's specifications. A copy of the user's manual or like document from the manufacturer shall be maintained onsite so that the District may verify calibration frequency and procedures. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
21. If the residual dissolved oxygen content in the sulfide oxidation tank falls below 1 mg/liter, the permittee shall immediately correct the system. If concentration falls below 1 mg/liter for more than 10 consecutive minutes, the permittee shall notify the District within the following 1 hour. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
22. The operator shall notify the APCO of an unplanned flaring event within 24 hours after the start of the next business day or within 24 hours of their discovery, whichever occurs first. The notification shall include the flare source identification, the start date and time, and the end date and time. [District Rule 4311] Federally Enforceable Through Title V Permit
23. The permittee shall maintain the following records: copies of annual source testing results; and a copy of the approved flare minimization plan. [District Rule 4311] Federally Enforceable Through Title V Permit
24. Permittee shall maintain a log of the residual dissolved oxygen content sensor calibrations, which shall include the date and time of each calibration and any corrective actions. The records shall be retained, maintained on-site for at least five years, and made available for District inspection upon request. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
25. Permittee shall maintain records of: (1) daily biogas production, (2) measured H₂S concentration in biogas, (3) date H₂S measurements taken from exhaust of biological reactor serving the scrubber, (4) measured concentration level of residual dissolved oxygen content taken from sulfide oxidation tank, and (5) date measurement of concentration level of residual dissolved oxygen content taken from sulfide oxidation tank. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
26. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 2201 and 4311] Federally Enforceable Through Title V Permit

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

APPENDIX C
ATC C-447-295-0



AUTHORITY TO CONSTRUCT

PERMIT NO: C-447-295-0

ISSUANCE DATE: 04/03/2012

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:

99 MMBTU/HR VICTORY ENERGY OPERATIONS NATURAL GAS/BIOGAS-FIRED BOILER EQUIPPED WITH A TODD VERIFLAME MODEL TODD VERIFLAME 99 LOW NOX BURNER, FLUE GAS RECIRCULATION SYSTEM, AND O2 CONTROLLER SERVED BY A NATIONWIDE MODEL CATASTAK SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM

CONDITIONS

1. Within 90 days of startup of the equipment authorized by this Authority to Construct, Permit to Operate C-447-4 shall be surrendered to the District and the associated equipment shall be removed or rendered inoperable. [District Rule 2201] Federally Enforceable Through Title V Permit
2. 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
3. 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
4. Prior to operating equipment under this Authority to Construct, permittee shall surrender NOx emission reduction credits for the following quantities of emissions: 1st quarter - 146 lb, 2nd quarter - 146 lb, 3rd quarter - 146 lb, and fourth quarter - 146 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 4/21/11). [District Rule 2201] Federally Enforceable Through Title V Permit

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-447-295-0 : Apr 3 2012 8:36AM - TOMS : Joint Inspection NOT Required

5. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantities of emissions: 1st quarter - 854 lb, 2nd quarter - 855 lb, 3rd quarter - 855 lb, and fourth quarter - 855 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 4/21/11). [District Rule 2201] Federally Enforceable Through Title V Permit
6. ERC Certificate Numbers N-849-2, N-972-2, C-1107-1 (or a certificate split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct [District Rule 2201] Federally Enforceable Through Title V Permit
7. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
8. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
10. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201] Federally Enforceable Through Title V Permit
11. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The boiler shall be equipped with an economizer system that consists of, at a minimum, a single stage economizer section which will recover energy from the boiler flue gas by heat exchange with the boiler feed water. The economizer system shall be designed at maximum boiler firing rate to either 1) reduce the temperature of the economizer flue gas outlet to a value no greater than 20 deg F above the temperature of the boiler feed water at maximum firing rate, or 2) heat the boiler feed water to a temperature which is no less than 30 deg F below the steam temperature at the steam drum, or 3) reduce the final temperature of the boiler's flue gas to a temperature no greater than 200 deg F. [California Environmental Quality Act]
13. Electric motors driving combustion air fans or induced draft fans shall have an efficiency meeting the standards of the National Electric Manufacturer's Association (NEMA) for "premium efficiency" motors and shall each be operated with a variable speed control or equivalent for control of flow through the fan. [California Environmental Quality Act]
14. The boiler shall be equipped with an O2 trim system designed to control oxygen content of the stack gases to a maximum of 3% by volume dry basis except during any period where the rate of fuel consumption by the boiler is less than 20% of maximum rated firing. [California Environmental Quality Act]
15. The boiler shall be designed to limit the recirculation of flue gas to a value not exceeding 10 percent of total flue gas volume while meeting the applicable requirements for control of NOx emissions from the boiler. [California Environmental Quality Act]
16. The boiler shall be equipped with an automatic boiler blowdown control system which minimizes boiler blowdown while controlling dissolved solids in the boiler water at an optimum level. [California Environmental Quality Act]
17. The boiler shall be equipped with a flash steam recovery system which will recover flash steam from the blowdown pressure reduction and utilize it for feedwater heating in the deaerator or feedwater heater. [California Environmental Quality Act]
18. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel combusted in the unit shall be installed, utilized and maintained. [District Rule 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
19. The unit shall only be fired on PUC-regulated natural gas and/or on scrubbed biogas from C-447-226. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
20. The H2S content of the scrubbed biogas fuel shall not exceed 50 ppmv. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. Except during start-up and shutdown, emissions from this unit shall not exceed any of the following limits: 5 ppmvd NO_x @ 3% O₂ or 0.006 lb-NO_x/MMBtu; 0.0022 lb-PM₁₀/MMBtu; 200 ppmvd CO @ 3% O₂ (equivalent to 0.147 lb-CO/MMBtu); or 0.0055 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
22. During start-up and shutdown, emissions from this unit shall not exceed any of the following limits: 0.83 lb-NO_x/hr; 0.0022 lb-PM₁₀/MMBtu; 200 ppmvd CO @ 3% O₂ (equivalent to 0.147 lb-CO/MMBtu); or 0.0055 lb-VOC/MMBtu.. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
23. The total duration of start-up time shall not exceed 5.0 hours per day. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
24. The total duration of startup time shall not exceed 4.0 hours per occurrence. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
25. The total duration of shutdown time shall not exceed 2.0 hours per day. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
26. The total duration of shutdown time shall not exceed 2.0 hours per occurrence. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
27. The permittee shall maintain daily records of start-up and shutdown durations and number of occurrences of each. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
28. The ammonia (NH₃) emissions shall not exceed 10 ppmvd @ 3% O₂ over a 15 minute averaging period. [District Rule 4102]
29. Source testing to measure NO_x and CO emissions from this unit while fired on natural gas shall be conducted within 60 days of initial start-up. [District Rules 2201, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
30. Source testing to measure natural gas combustion NO_x, CO, and NH₃ emissions from this unit shall be conducted at least once every twelve months. After demonstrating compliance on two consecutive annual source tests when unit is fired on natural gas, the unit shall be tested not less than once every 36 months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve months. [District Rules 2201, 4102, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
31. Nitrogen oxide (NO_x) emission concentrations in ppmv referenced at dry stack emissions shall be corrected to 3% O₂ and lb/MMBtu rates shall be calculated as lb NO₂/MMBtu of heat input (hhv). [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
32. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
34. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
35. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
36. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
37. Source testing for ammonia slip shall be conducted utilizing BAAQMD Method ST-1B. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

38. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
39. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
40. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
41. The permittee shall monitor and record the stack concentration of NO_x, CO, NH₃, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. NH₃ monitoring shall be conducted utilizing Draeger tubes or a District approved equivalent method. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within five days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4102, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
42. If the NO_x, CO or NH₃ concentrations, as measured by the portable analyzer or the District approved ammonia monitoring equipment, exceed the permitted levels, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than one hour of operation after detection. If the portable analyzer or the ammonia monitoring equipment continue to show emission limit violations after one hour of operation following detection, the permittee shall notify the District within the following one hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
43. All NO_x, CO, O₂ and NH₃ emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The NO_x, CO and O₂ analyzer as well as the NH₃ emission monitoring equipment shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
44. NH₃ emission readings shall be conducted at the time the NO_x, CO and O₂ readings are taken. The readings shall be converted to ppmvd @ 3% O₂. [District Rule 4102]
45. The permittee shall maintain records of: (1) the date and time of NO_x, CO, NH₃, and O₂ measurements, (2) the O₂ concentration in percent by volume and the measured NO_x, CO, and NH₃ concentrations corrected to 3% O₂, (3) make and model of the portable analyzer, (4) portable analyzer calibration records, (5) the method of determining the NH₃ emission concentration, and (6) a description of any corrective action taken to maintain the emissions at or below the acceptable levels. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
46. Operator shall provide that fuel hvh be certified by third party fuel supplier or determined annually by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588. [District Rules 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
47. Permittee shall determine sulfur content of combusted natural gas annually or shall demonstrate that the combusted natural gas is provided from a PUC or FERC regulated source. [District Rules 1081 and 4320] Federally Enforceable Through Title V Permit
48. The permittee shall monitor the biogas H₂S concentration at the outlet of the biogas scrubber (Permit to Operate C-447-226) on a weekly basis. If the biogas H₂S concentration does not exceed 50 ppmv for four consecutive weeks, monitoring may be conducted on a monthly basis. If the H₂S concentration at the outlet exceeds 50 ppmv, weekly monitoring shall resume. [District Rule 4320] Federally Enforceable Through Title V Permit
49. The permittee shall take readings of the NO_x concentration and O₂ percent, by volume, using the in-stack monitoring system at least once per each day that the boiler operates. [District Rule 2201 and 40 CFR Part 64.9] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

50. During times when the in-stack monitoring system is down for maintenance or repairs, the permittee shall use a District approved portable analyzer to record daily NO_x and O₂ concentrations. The permittee shall maintain records of the portable analyzer readings including the date(s) and reason the in-stack monitoring system was not operating. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
51. The permittee shall maintain daily records of the NO_x and O₂ concentration from the in-stack monitoring system. These records shall be made available for District inspection upon request. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
52. The permittee shall compare the NO_x and O₂ concentrations from the in-stack monitoring system with the concentration of NO_x and O₂ readings from calibration gas cylinders for NO_x and O₂ at least once during each month that the boiler operates. The permittee shall maintain these comparison readings and these records shall be available for District inspection upon request. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
53. If the NO_x or O₂ concentrations, as measured by the in-stack monitoring system, exceed the permitted levels the permittee shall return the emissions to compliant levels as soon as possible, but no longer than 1 hour of operation after detection. If the in-stack monitoring system continues to show emission limit violations after 1 hour of operation following detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4102, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit
54. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64.7] Federally Enforceable Through Title V Permit
55. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64.8] Federally Enforceable Through Title V Permit
56. The permittee shall comply with the record keeping and reporting requirements of 40 CFR part 64.9. [40 CFR Part 64.9] Federally Enforceable Through Title V Permit
57. Permittee shall maintain daily records of the type and quantity of fuel combusted by the boiler. [District Rules 2201 and 40 CFR 60.48 (c)(g)] Federally Enforceable Through Title V Permit
58. All records shall be maintained and retained on-site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306, and 4320] Federally Enforceable Through Title V Permit

APPENDIX D
Compliance Certification

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

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- Federal Major Permit MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION 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):

- PC* 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).
- PC* 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.
- PC* Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- PC* 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

08/12/13

Date

Mr. Phil Castro

Name of Responsible Official (please print)

Plant Manager – Fresno Winery

Title of Responsible Official (please print)