



OCT 14 2015

Mr. Dan Martin
E & J Gallo Winery - Livingston
18000 W River Road
Livingston, CA 95334

**Re: Notice of Minor Title V Permit Modification
District Facility # N-1237
Project # N-1153179**

Dear Mr. Martin:

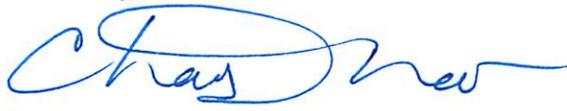
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued N-1237-763-0 (under project N-1143311) into the Title V operating permit. E & J Gallo Winery received an Authority to Construct permit to install a grape pomace and wine solids drying operation consisting of one solids conveyor and one perforated belt dryer served by an AAF International OptiFlo 4RC32 dust collector.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-1237-763-0, 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.

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,



for Arnaud Marjollet
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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1153179

Engineer: Andrea Ogden
Date: October 13, 2015

Facility Number: N-1237
Facility Name: E & J Gallo Winery - Livingston
Mailing Address: 18000 W River Road
Livingston, CA 95334

Contact Name: Dan Martin
Phone: (209) 394-6211

Responsible Official: Dan Martin
Title: Plant Manager - Livingston Winery

I. PROPOSAL

E & J Gallo Winery - Livingston is proposing a Title V minor permit modification to incorporate recently issued N-1237-763-0 (under project N-1143311) into the Title V operating permit. E & J Gallo Winery received an Authority to Construct permit to install a grape pomace and wine solids drying operation consisting of one solids conveyor and one perforated belt dryer served by an AAF International OptiFlo 4RC32 dust collector.

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

18000 W River Road in Livingston, CA

III. EQUIPMENT DESCRIPTION

N-1237-763-0: GRAPE POMACE AND WINE SOLIDS DRYING OPERATION CONSISTING OF ENCLOSED RECEIVING AND DISCHARGE SCREW CONVEYORS AND A NEW ECO-TEC GERMANY DRYER SERVED BY AN AAF INTERNATIONAL OPTIFLO 4RC32 DUST COLLECTOR

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 installed a grape pomace and wine solids drying operation consisting of one solids conveyor and one perforated belt dryer served by an AAF International OptiFlo 4RC32 dust collector.

N-1237-763-0:

Authority to Construct condition 1 was not included on the proposed Permit to Operate. This condition required E & J Gallo Winery to submit a Title V minor modification application prior to operating under the revised provisions of the ATC permit. The application has been submitted as required and the condition is no longer necessary.

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 Modified Title V Operating Permit
- B. Authority to Construct
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1237-763-1

EXPIRATION DATE: 09/30/2015

EQUIPMENT DESCRIPTION:

GRAPE POMACE AND WINE SOLIDS DRYING OPERATION CONSISTING OF ENCLOSED RECEIVING AND DISCHARGE SCREW CONVEYORS AND ECO-TEC GERMANY DRYER SERVED BY AN AAF INTERNATIONAL OPTIFLO 4RC32 DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Visible emissions from the dust collector serving the grape pomace and wine solids drying operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 4102]
4. 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 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. The dust collector shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The cleaning frequency and duration for the dust collector shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Replacement cartridges numbering at least 10% of the total number of cartridges in each dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the cartridges. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The differential pressure gauge reading shall be established per manufacturer's recommendation at the time of the startup inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM10 emissions from the dust collector shall not exceed 0.00052 lb/ton material throughput. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maximum amount of material throughput shall not exceed 168 tons/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Differential operating pressure for the baghouse shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of all maintenance of each baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. Records of daily and annual amount of material throughput shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
16. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

DRAFT

ATTACHMENT B

Authority to Construct

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1237-763-0

ISSUANCE DATE: 11/19/2014

LEGAL OWNER OR OPERATOR: E & J GALLO WINERY
MAILING ADDRESS: ATTN: EHS MANAGER
18000 W RIVER RD
LIVINGSTON, CA 95334

LOCATION: 18000 W RIVER RD
LIVINGSTON, CA 95334

EQUIPMENT DESCRIPTION:
GRAPE POMACE AND WINE SOLIDS DRYING OPERATION CONSISTING OF ENCLOSED RECEIVING AND DISCHARGE SCREW CONVEYORS AND A NEW ECO-TEC GERMANY DRYER SERVED BY AN AAF INTERNATIONAL OPTIFLO 4RC32 DUST COLLECTOR

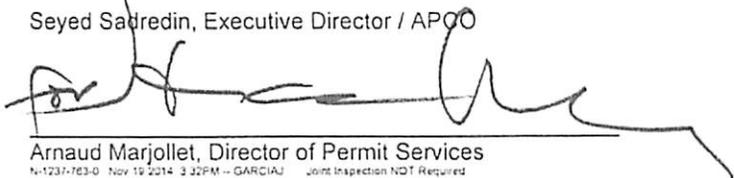
CONDITIONS

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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Visible emissions from the dust collector serving the grape pomace and wine solids drying operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
4. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 4102]
5. 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 4102]
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
7. The dust collector shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
8. The cleaning frequency and duration for the dust collector shall be adjusted to optimize the control efficiency. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCC



Arnaud Marjollet, Director of Permit Services

N-1237-763-0 Nov 19 2014 3:22PM - GARCIAJ Joint Inspection NOT Required

9. Replacement cartridges numbering at least 10% of the total number of cartridges in each dust collector shall be maintained on the premises. [District Rule 2201]
10. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the cartridges. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
11. The differential pressure gauge reading shall be established per manufacturer's recommendation at the time of the startup inspection. [District Rule 2201]
12. PM10 emissions from the dust collector shall not exceed 0.00052 lb/ton material throughput. [District Rule 2201]
13. Maximum amount of material throughput shall not exceed 168 tons/day. [District Rule 2201]
14. Differential operating pressure for the baghouse shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201]
15. Records of all maintenance of each baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201]
16. Records of daily and annual amount of material throughput shall be maintained. [District Rule 2201]
17. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
N-1237-763-0	0	0	0	0	32
TOTAL	0	0	0	0	32

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

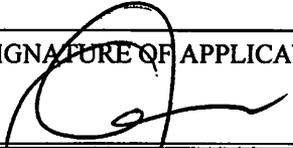
RECEIVED

OCT 09 2015

Permit Application For:

- | | | | |
|-------------------------------------|------------------------------|--|------------------------------------|
| <input type="checkbox"/> | AUTHORITY TO CONSTRUCT (ATC) | - New Emission Unit | Permits Services
SJVAPCD |
| <input checked="" type="checkbox"/> | AUTHORITY TO CONSTRUCT (ATC) | - Modification Of Emission Unit With Valid PTO/Valid ATC | |
| <input type="checkbox"/> | AUTHORITY TO CONSTRUCT (ATC) | - Renewal of Valid Authority to Construct | |
| <input type="checkbox"/> | PERMIT TO OPERATE (PTO) | - Existing Emission Unit Now Requiring a Permit to Operate | |

1. PERMIT TO BE ISSUED TO: E&J Gallo Winery-Livingston	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>18000 W. River Road</u>	
CITY: <u>Livingston</u> STATE: <u>CA</u> ZIP CODE: <u>95334</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 modification permit application for N-1237-763 (LWINE dryer). Targeted startup during 1Q15.
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)? <u>NA</u> <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)	
Minor modification permit application associated with LWINE dryer, N-1237-763. The minor modification permit application is submitted to the District prior to the prestartup inspection. Please see attached the completed compliance certification form (TV-9).	
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. <u>NA</u>	
	<input type="checkbox"/> 3-day review <input type="checkbox"/> 10-day review <input 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>N-1237</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. Dan Martin	TITLE OF APPLICANT: Plant Manager-Livingston Winery
13. SIGNATURE OF APPLICANT:  DATE: <u>10/07/15</u>	PHONE #: (209) 394-6211 E-MAIL: dan.martin@ejgallo.com

FOR APCD USE ONLY:

DATE STAMP: _____	FILING FEE RECEIVED: \$ <u>0</u> CHECK #: _____ DATE PAID: _____ PROJECT #: <u>N-1153179</u> FACILITY ID: <u>N-1237</u>
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E&J Gallo Winery

18000 W. River Road, Livingston, CA 95334
t |(209) 394-6219 f |(209) 394-5936 w | www.gallo.com

October 7, 2015

Mr. Jim Swaney
San Joaquin Valley Air Pollution Control District
Permitting Services Department
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244

RE: E&J Gallo Winery-Livingston
LVW- LWINE Dryer, N-1237-763
Minor Modification Permit Application

Dear Mr. Swaney:

Attached please find the following documents comprising the minor modification permit application:

- Completed Authority to Construct Permit Application for the LWINE dryer, N-1237-763 (TV-8)
- Completed Compliance Certification

The minor modification permit application is submitted to the District prior to the pre-startup inspection.

Thank you for your time in regard to this matter. If you have questions or require additional information, please contact Mr. Mariel Zare at 209-394-5930.

Regards,

A handwritten signature in black ink, appearing to be 'Dan Martin', written over a circular stamp or seal.

Dan Martin
Plant Manager-Livingston Winery

Enc.



E&J Gallo Winery

18000 W. River Road, Livingston, CA 95334
t |(209) 394-6219 f |(209) 394-5936 w | www.gallo.com

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October 7, 2015

Mr. Jim Swaney

RE: E&J Gallo Winery-Livingston

LVW- LWINE Dryer, N-1237-763

Minor Modification Permit Application

bcc w/enc.: Mariel Zare, Livingston
Kim Burns, Fresno
Livingston Environmental Files

San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

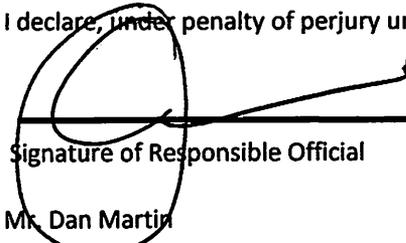
- Federal Major Permit MODIFICATION
 MINOR PERMIT MODIFICATION
- ADMINISTRATIVE
AMENDMENT

COMPANY NAME: E&J Gallo Winery - Livingston	FACILITY ID N-1237
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-Livingston	
3. Agent to the Owner: Mr. Dan Martin	

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

10/7/15

Date

Mr. Dan Martin

Name of Responsible Official (please print)

Plant Manager- Livingston Winery

Title of Responsible Official (please print)