

Capture of VOCs with Thermal or Catalytic Oxidation/ Carbon Adsorption/Absorption or Condensation (Options 2,3,4, and 5)

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

a. Control Efficiency

Option 2 is capable of a 98% reduction in VOC emissions while the remaining options under consideration have lesser control efficiencies. Showing that all of the options under consideration are not cost effective at a 98% reduction level based on capital investment requirements of ductwork and steel alone is adequate since options other than thermal/catalytic oxidation would be even less cost effective at their actual (lower) reduction levels.

$$\begin{aligned}\text{Annual Emission Reduction} &= \text{Uncontrolled Emissions} \times 0.98 \\ &= 11,761 \text{ lb-VOC/year} \times 0.98 \\ &= 11,526 \text{ lb-VOC/year} \\ &= 5.76 \text{ tons-VOC/year}\end{aligned}$$

b. Capital Investment For Installation of a VOC Collection System

Design and Estimate Basis:

- The basis and approach for the capital cost estimate for ductwork and support steel is summarized in BACT Attachment 1.
- The collection system consists of stainless steel plate ductwork (stainless steel is required due to cleanliness and sterilization requirements for wine quality considerations and due to the food grade product status) with isolation valving, connecting twelve 200,000 gallon tanks to a common manifold system which ducts the combined vent to the common control device. The cost of dampers and isolation valving, installed in the ductwork, will not be included in the cost estimate.

- A minimum duct size is established at 6 inches diameter at each tank to ensure minimal backpressure of the tank during filling operations and to provide adequate strength for spanning between supports. The main header is 12" diameter to handle the potential for simultaneously venting all tanks based on a potential fill rate of 1000 gpm for each tank (per applicant) and a duct velocity of 2000 feet per minute.
- The ductwork is designed with features to facilitate clean-in-place (CIP) operation to allow for periodic sterilization procedures as required for food grade products. The CIP system includes strategically placed spray nozzles on the ductwork for injecting sterilizing solutions into the system. Cost impacts to install CIP systems to clean the ducting are not included in the cost estimate.
- The ductwork is supported on a structural steel piperack mounted on drilled concrete piers, running through the new tank battery. Ducting elevations are established to allow continuous free draining to the separator located at the control device.
- Unit Installed Costs for Ductwork: A direct cost estimate for 12" diameter stainless steel ductwork, installed in a San Joaquin Valley winery, was taken from a study prepared by Eichleay Engineering for the Wine Institute in conjunction with development of District Rule 4694.⁸ The estimate is based on 2nd quarter 2005 dollars, and includes fittings, miscellaneous duct supports and other materials plus field labor costs required to install the ductwork, but does not include other associated indirect costs such as construction management, engineering, owner's cost, contingency, etc. BACT Attachment 1 presents the development of unit installed costs for stainless steel ducting based on the costs derived from the Eichleay estimate.
- Linear feet of ducting required was extracted from the Eichleay Estimate for a similar system at Gallo-Livingston (see BACT Attachment 1).
- Costs for structural steel supports and foundations were extracted from the Eichleay Estimate for a similar system at Gallo-Livingston (see BACT Attachment 1).
- Sales tax of 8% was applied to all materials.
- Indirect costs include Engineering, Construction Expense and Contractor's Fee and Contingency. Factors for these costs are taken from Peters & Timmerhaus⁹.
- Capital costs taken from the Eichleay estimate are 2005 dollars. These are escalated to 2009 based on 3% overall escalation per year.

Capital Investment (for ductwork and steel supports)

Fixed Capital Investment is summarized in the following table:

⁸ Eichleay Engineers of California, Fermenter VOC Emissions Control Cost Estimate (Revision 1), Eichleay Project Numbers 30892 and 30913, June 30, 2005

⁹ Peters & Timmerhaus, Plant Design and Economics for Chemical Engineers, 2nd Edition, McGraw-Hill, 1968, p.140.

Annualized Capital Investment and Cost Effectiveness (based on ductwork):

Annualized Capital Investment = Initial Capital Investment x Amortization Factor

Amortization Factor = 0.163 per District policy, amortizing over 10 years at 10%

Therefore,

Annualized Capital Investment = \$830,759 x 0.163 = \$135,414

Cost Effectiveness = Annualized Cost/Annual Emission Reductions

Cost Effectiveness = \$135,414/5.76 tons-VOC = \$23,509/ton-VOC

As shown above, the cost of VOC reduction by capture of VOCs with thermal or catalytic oxidation, carbon adsorption, absorption or condensation would be greater than the \$17,500/ton cost effectiveness threshold for VOC in the District BACT policy, based only on the direct cost required for the collection ducting. Therefore these options are not cost-effective and will not be considered for this project.

Step 5 - Select BACT

All identified feasible options with control efficiencies higher than the option proposed by the facility have been shown to not be cost effective. The facility has proposed Option 1, insulated tank, pressure/vacuum valve set within 10% of the maximum allowable working pressure of the tank, "gas tight" tank operation and achieve and maintain a continuous storage temperature not exceeding 75 °F within 60 days of completion of fermentation. These BACT requirements will be placed on the ATC as enforceable conditions.

Attachments:

BACT 5.4.13 Attachment 1: Development of Direct Costs for Installation of a VOC Collection System on a Battery of Wine Storage Tanks

BACT 5.4.13 Attachment 2: Plot Plan for Gallo-Livingston (Eichleay Study)

BACT 5.4.13 Attachment 3: Ducting Costs for VOC-2 (Eichleay Study)

BACT 5.4.13 Attachment 4: Structural Steel Costs for VOC-2 (Eichleay Study)

BACT 5.4.13 Attachment 5: Foundation Costs for VOC-2 (Eichleay Study)

BACT 5.4.13 Attachment 1

**Development of Direct Costs for Installation of a VOC Collection
System on a Battery of Wine Storage Tanks**

Background

During the development of District Rule 4694 (Wine Fermentation and Storage Tanks), The Wine Institute commissioned a study by Eichleay Engineers of California to develop costs for installation of VOC controls on all wine fermentation tanks at the Gallo winery located at Livingston, CA. The SJVAPCD participated in development of the study and in the review of the final draft. The District reviewed this estimate (Eichleay study) in conjunction with the development of District Rule 4694 (see Appendix C, Final Draft Staff Report - Rule 4694, December 15, 2005). The District's review indicated that, although the District took issue with various scope elements of the overall estimate, the estimating methodology employed appears to be fundamentally sound and follows accepted practice in the engineering and construction industry, accurately estimating the material quantities required for the stated scope and applying reasonable unit rates and costs for materials and labor for development of direct costs.

The Eichleay study developed detailed direct cost estimates for four separate tank batteries at Gallo-Livingston; VOC-1, '-2, '-3 and '-4 (see plot diagram in Attachment A). The direct cost estimate scope for each battery included a stainless steel ducting manifold system connected to a VOC control device and structural steel ducting supports with associated foundations. VOC-2 is a tank battery consisting of twelve (12) 200,000 gallon capacity tanks, identical to the hypothetical "industry-typical" tank battery installation which forms the basis for the cost effectiveness calculations for this BACT determination. The estimates of ducting, steel supports and foundations prepared in the Eichleay study for VOC-2 can be used as a basis to establish costs for the cost effectiveness evaluation required by this BACT determination.

Approach and Estimate Basis

Ducting

Attachment B is the detailed direct cost estimate from the Eichleay study for ducting for VOC-2 (annotated to indicate the required subtotals). Since VOC-2 at Gallo-Livingston consists of twelve fermentation tanks rather than storage tanks, the diameter of the estimated ductwork is larger than required for storage-only tanks due to the much larger vent rate from fermentation. However, since the tank sizes and layout considerations would not be affected by tank utilization, the Eichleay estimate of total linear footage and duct fittings ductwork can be utilized directly. The estimate details in Attachment B are utilized in the following manner to develop ducting costs for the "industry typical" tank battery:

- Linear feet of ductwork required is taken directly from the Eichleay estimate for VOC-2 (Attachment B). Linear feet required for individual branch connections to each tank is given by the footage of 12" diameter ducting while the linear footage for the main header is represented by the balance of the ductwork for

VOC-2. Based on this approach, 75 linear feet of ducting is required for branch connections to the tanks while 870 feet of ducting is required for the main headers and the ducting run to the control device. Since the "industry-typical" ducting for storage tanks has been determined to be 6" diameter for branch connections and 12" diameter for the main header, the following material requirements are established for the "industry-typical" storage tank battery:

6" diameter ducting: 75 linear feet

12" diameter ducting: 870 linear feet

- Unit direct cost (\$ per foot) of 12" diameter ducting can be determined by adding the labor and material costs required and dividing by the total linear footage of the particular diameter of ducting included in the estimate. For the 75 linear feet of 12" diameter ducting included in the Eichleay estimate for VOC-2, total labor and material costs were estimated at \$5,137 and \$5,650 respectively. Dividing each figure by 75 yields the unit labor and material costs for 12" diameter ducting:

Unit labor cost for 12" ducting: \$68.49/ft

Unit material cost for 12" ducting: \$75.33/ft

- The Eichleay estimate did not include estimates of direct cost for 6" diameter duct. Therefore, it is necessary to develop a cost by appropriate factoring of the 12" diameter cost. To adjust the direct cost to a 6" system, cost equations for stainless steel plate ductwork are taken from the EPA Air Pollution Control Manual, Section 2, Chapter 1, Table 1.9, which indicates a cost equation for stainless steel plate duct as follows:

$$\text{Duct Cost} = 6.29 \times (\text{Duct Diameter}_{\text{inches}})^{1.23}$$

Using this equation form, it is apparent the relative cost of 6" duct versus 12" duct can be calculated as follows:

$$6" \text{ Duct Cost} = 12" \text{ Duct Cost} \times (6/12)^{1.23}$$

Since the EPA cost manual develops total direct cost based on applying additional factors to the duct cost, the use of the above factor for adjustment of the total direct cost is consistent with EPA cost estimation methods.

Therefore,

$$\text{Unit Labor Cost for 6" Duct} = \$68.49 \times (6/12)^{1.23} = \$29.20/\text{linear foot}$$

$$\text{Unit Material Cost for 6" Duct} = \$75.33 \times (6/12)^{1.23} = \$32.11/\text{linear foot}$$

Structural Steel

- Structural steel cost can be assumed to be the same for the “industry-typical” system as for VOC-2 since the heights and sizes of structure will be the same. Attachment C is the Eichleay estimate of structural steel required for VOC-2, annotated to show required subtotal. Based on this approach, structural steel cost for the industry-typical” case is as follows:

Purchased Structural Steel:	\$287,630
Labor for Erection of Structural Steel:	\$45,273

Foundations

- Cost for foundations for the structural steel towers can be assumed to be the same for the “industry-typical” system as for VOC-2 since the heights and sizes of structure are assumed to be the same. Attachment D is the Eichleay estimate of the foundations required for VOC-2, annotated to show required subtotal. Pricing is based on a subcontract price including labor and materials. Based on this approach, 32 drilled concrete piers are required at a subcontract cost of \$1,000 each.

BACT 5.4.13 Attachment 2
Plot Plan for Gallo-Livingston (Eichleay Study)

BACT 5.4.13 Attachment 3
Ducting Costs for VOC-2 (Eichleay Study)



Eichleay
Engineers Inc. of CA

Client Name: Wine Institute

Job Number: 30913

Job Title: Fermenter VOC Emissions - Livingston West Side Fermenters

Estimated By: P.H.M.

Checked By: R.H.

Rev. 2 Date: 6/24/05

CODE	ITEM DESCRIPTION	QUANT	UNIT	MHR/UNIT	TOTAL MHRS	UNIT COSTS			TOTAL COSTS			TOTAL
						\$/Hr	MAT'L	SUBCON.	TOTAL	LABOR	MAT'L	
1	Bolt up	100	ea	6.5	650	65.00			422.50	42,250		42,250
1	Handle	96	ea	7.2	691.2	65.00			468.00	44,928		44,928
1	Install	20	lot	3	60	65.00			195.00	3,900		3,900
VOC-2												
2	12" Duct	75	ft				62.00		62.00		650	4,650
2	12" Duct misc. fittings	1	lot				1,000.00		1,000.00		1,000	1,000
2	Bolt up	21	ea	1.5	31.5	65.00			97.50	2,048		2,048
2	Handle	19	ea	2.08	39.52	65.00			135.20	2,569		2,569
2	Install	4	lot	2	8	65.00			30.00	520		520
2	18" Duct	65	ft				86.00		86.00		5,590	5,590
2	18" Duct misc. fittings	1	lot				2,000.00		2,000.00		2,000	2,000
2	Bolt up	19	ea	3	57	65.00			195.00	3,705		3,705
2	Handle	17	ea	3.52	59.84	65.00			228.80	3,890		3,890
2	Install	3	lot	2	6	65.00			130.00	390		390
2	22" Duct	50	ft				99.00		99.00		4,950	4,950
2	22" Duct misc. fittings	1	lot				2,000.00		2,000.00		2,000	2,000
2	Bolt up	15	ea	4	60	65.00			260.00	3,900		3,900
2	Handle	13	ea	4.6	59.8	65.00			299.00	3,887		3,887
2	Install	3	lot	3	9	65.00			195.00	585		585
2	24" Duct	35	ft				106.00		106.00		3,710	3,710
2	24" Duct misc. fittings	1	lot				3,000.00		3,000.00		3,000	3,000
2	Bolt up	11	ea	4	44	65.00			260.00	2,860		2,860
2	Handle	9	ea	4.6	41.4	65.00			299.00	2,691		2,691
2	Install	2	lot	3	6	65.00			195.00	390		390
2	28" Duct	15	ft				119.00		119.00		1,785	1,785
2	28" Duct misc. fittings	1	lot				2,000.00		2,000.00		2,000	2,000
2	Bolt up	5	ea	5.5	27.5	65.00			357.50	1,788		1,788
2	Handle	4	ea	5.32	21.28	65.00			345.80	1,383		1,383

Total Ducting > 12" dia = 870'

Labor & Mat'l cost for 15' of 12" duct 5,650

5,137

Client Name: Wine Institute
 Job Number: 30913
 Job Title: Fermenter VOC Emissions - Livingston West Side Fermenters



Eichle
 Engineers Inc. of CA

~~UNRECORDED~~

Estimated By: P.H.M.
 Checked By: R.H.
 Rev. 2 Date: 6/24/05

CODE	ITEM DESCRIPTION	QUANT	UNIT	MHR/ UNIT	TOTAL MHRS	UNIT COSTS			TOTAL COSTS			TOTAL	
						\$ / Hr	MAT'L	SUBCON.	TOTAL	LABOR	MAT'L		SUBCON.
2	Install	1	lot	3	3	65.00			195.00	195			195
2	30" Duct	25	ft				128.00		128.00		3,200		3,200
2	30" Duct misc. fittings	1	lot				2,000.00		2,000.00		2,000		2,000
2	Bolt up	8	ea	5.5	44	65.00			357.50	2,860			2,860
2	Handle	6	ea	5.32	31.92	65.00			345.80	2,075			2,075
2	Install	1	lot	3	3	65.00			195.00	195			195
2	32" Duct	265	ft				177.00		177.00		46,905		46,905
2	32" Duct misc. fittings	1	lot				4,500.00		4,500.00		4,500		4,500
2	Bolt up	68	ea	6	408	65.00			390.00	26,520			26,520
2	Handle	66	ea	6	396	65.00			390.00	25,740			25,740
2	Install	13	lot	3	39	65.00			195.00	2,535			2,535
2	42" Duct	415	ft				242.00		242.00		100,430		100,430
2	42" Duct misc. fittings	1	lot				25,000.00		25,000.00		25,000		25,000
2	Bolt up	115	ea	6.5	747.5	65.00			422.50	48,588			48,588
2	Handle	104	ea	7.12	740.48	65.00			462.80	48,131			48,131
2	Install	21	lot	4	84	65.00			260.00	5,460			5,460
	VOC-3												
3	6" Duct	25	ft				38.00		38.00		950		950
3	6" Duct misc. fittings	1	lot				500.00		500.00		500		500
3	Bolt up	7	ea	1	7	65.00			65.00	455			455
3	Handle	6	ea	1.4	8.4	65.00			91.00	546			546
3	Install	1	lot	1.5	1.5	65.00			97.50	98			98
3	10" Duct	35	ft				54.00		54.00		1,890		1,890
3	10" Duct misc. fittings	1	lot				1,000.00		1,000.00		1,000		1,000
3	Bolt up	11	ea	1.5	16.5	65.00			97.50	1,073			1,073
3	Handle	9	ea	1.72	15.48	65.00			111.80	1,006			1,006
3	Install	2	lot	2	4	65.00			130.00	260			260
3	12" Duct	70	ft				62.00		62.00		4,340		4,340

BACT 5.4.13 Attachment 4
Structural Steel Costs for VOC-2 (Eichleay Study)



Eichle
Engineers Inc. of CA

Client Name: Wine Institute

Job Number: 30913

Job Title: Fermenter VOC Emissions - Livingston West Side Fermenters

Estimated By: P.H.M.

Checked By: R.H.

Rev. 2 Date: 6/24/05

~~PRELIMINARY~~

CODE	ITEM DESCRIPTION	QUANT	UNIT	MHR/UNIT	TOTAL MHRS	UNIT COSTS			TOTAL COSTS			TOTAL	
						\$/Hr	MAT'L	SUBCON.	TOTAL	LABOR	MAT'L		SUBCON.
2	Install	1	lot	3	3	65.00			195.00	195			195
2	30" Duct	25	ft				128.00		128.00		3,200		3,200
2	30" Duct misc. fittings	1	lot				2,000.00		2,000.00		2,000		2,000
2	Bolt up	8	ea	5.5	44	65.00			357.50	2,860			2,860
2	Handle	6	ea	5.32	31.92	65.00			345.80	2,075			2,075
2	Install	1	lot	3	3	65.00			195.00	195			195
2	32" Duct	265	ft				177.00		177.00		46,905		46,905
2	32" Duct misc. fittings	1	lot				4,500.00		4,500.00		4,500		4,500
2	Bolt up	68	ea	6	408	65.00			390.00	26,520			26,520
2	Handle	66	ea	6	396	65.00			390.00	25,740			25,740
2	Install	13	lot	3	39	65.00			195.00	2,535			2,535
2	42" Duct	415	ft				242.00		242.00		100,430		100,430
2	42" Duct misc. fittings	1	lot				25,000.00		25,000.00		25,000		25,000
2	Bolt up	115	ea	6.5	747.5	65.00			422.50	48,588			48,588
2	Handle	104	ea	7.12	740.48	65.00			462.80	48,131			48,131
2	Install	21	lot	4	84	65.00			260.00	5,460			5,460
	VOC-3												
3	6" Duct	25	ft				38.00		38.00		950		950
3	6" Duct misc. fittings	1	lot				500.00		500.00		500		500
3	Bolt up	7	ea	1	7	65.00			65.00	455			455
3	Handle	6	ea	1.4	8.4	65.00			91.00	546			546
3	Install	1	lot	1.5	1.5	65.00			97.50	98			98
3	10" Duct	35	ft				54.00		54.00		1,890		1,890
3	10" Duct misc. fittings	1	lot				1,000.00		1,000.00		1,000		1,000
3	Bolt up	11	ea	1.5	16.5	65.00			97.50	1,073			1,073
3	Handle	9	ea	1.72	15.48	65.00			111.80	1,006			1,006
3	Install	2	lot	2	4	65.00			130.00	260			260
3	12" Duct	70	ft				62.00		62.00		4,340		4,340

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BACT 5.4.13 Attachment 5
Foundation Costs for VOC-2 (Eichleay Study)



Eichler
Engineers Inc. of CA

Client Name: Wine Institute

Job Number: 30913

Job Title: Fermenter VOC Emissions - Livingston West Side Fermenters

Estimated By: P.H.M.

Checked By: R.H.

Rev. 2 Date: 6/24/05

PRELIMINARY ESTIMATE

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CODE	ITEM DESCRIPTION	QUANT	UNIT	MHR/ UNIT	TOTAL MHRS	UNIT COSTS				TOTAL COSTS			TOTAL
						\$ / Hr	MAT'L	SUBCON.	TOTAL	LABOR	MAT'L	SUBCON.	
	030 - Concrete												
	VOC -1 Duct sections												
1	Install drilled piers (20) rack #1	20	ea					1,000.00	1,000.00			20,000	20,000
1	Install drilled piers (20) rack #2	20	ea					1,000.00	1,000.00			20,000	20,000
1	Install drilled piers (42) for main rack inside plant	42	ea					1,500.00	1,500.00			63,000	63,000
1	Install drilled piers (46) for main rack outside plant	46	ea					700.00	700.00			32,200	32,200
1	Install drilled piers (32) for main rack by VOC's	32	ea					700.00	700.00			22,400	22,400
1	Install foundation for VOC-1 & tank	110	cy					450.00	450.00			49,500	49,500
	VOC -2 Duct sections												
2	Install drilled piers (16) rack #3	16	ea					1,000.00	1,000.00			16,000	16,000
2	Install drilled piers (18) rack #4	18	ea					1,000.00	1,000.00			18,000	18,000
2	Install foundation for VOC-1 & tank	110	cy					450.00	450.00			49,500	49,500
	VOC -3 Duct sections												
3	Install drilled piers (16) rack #6	16	ea					1,000.00	1,000.00			16,000	16,000
3	Install drilled piers (20) rack #7	20	ea					1,000.00	1,000.00			20,000	20,000
3	Install foundation for VOC-1 & tank	110	cy					450.00	450.00			49,500	49,500
	VOC -4 Duct sections												
4	Install drilled piers (0) rack #4		ea					1,000.00	1,000.00				
4	Install drilled piers (20) rack #5	20	ea					1,000.00	1,000.00			20,000	20,000
4	Install foundation for VOC-1 & tank	110	cy					450.00	450.00			49,500	49,500
	Allowance for building pad	3	cy						450.00	450.00		1,350	1,350
	TOTAL - Concrete											444,950	444,950

Drilled Piers

Attachment F

Calculation of the Annual Potential to Emit (PE_{2N}) for New
Fermentation Tanks

Calculation of the Annual Potential to Emit (PE_{2N}) for New Tanks

A. Assumptions

- Maximum ethanol content of stored wine is 23.9%.
- Grape crushing capacity at this facility is 10,368 tons per day based on information provided by the applicant for this project.
- Pressing capacity at this facility is 14,740 tons per day based on information provided by the applicant for this project.
- The total pre-project tank volume that can potentially be used for red wine fermentation is 32,381,947 gallons.
- The total pre-project tank volume that can potentially be used for white wine fermentation is 32,981,947 gallons.
- The total post-project tank volume that can potentially be used for red wine fermentation is 35,184,947 gallons.
- The total post-project tank volume that can potentially be used for white wine fermentation is 35,184,947 gallons.
- Annual potential emissions for fermentation operations will be calculated as a combined value reflecting potential emissions from the winery's total wine production capacity.
- The calculation approach for determining combined emission values for the fermentation operations will follow the draft District policy attached in Appendix B.

B. Emission Factors

The required emission factors for fermentation and storage operations are taken from District FYI-114, *Estimating VOC Emissions from Winery Tanks*:

Annual emissions from red wine fermentation: E_{fr} 6.2 lb-VOC/1000 gallons annual throughput

Annual emissions from white wine fermentation: E_{fw} = 2.5 lb-VOC/1000 gallons annual throughput

C. Calculations

As discussed in Attachment G, tanks operating in a winery are not truly independent emissions units, with the result that the theoretical "stand-alone" annual potential to emit for individual tanks cannot be defined (their theoretical annual fermentation/storage capacity, and thus their potential annual emissions, must be established with consideration of all the other associated tanks in the facility). PE_{2N} is therefore determined as the difference between the post project and the pre project potential emission from the wine production operation based on the collective physical capacity of the processing equipment at the facility.

1. Annual emission potentials for fermentation operations from existing tanks

The potential emissions from the fermentation operation at this facility, based on the physical capacity of the existing processing equipment, PE_{1E(fermentation)}, is determined in the following sequence of calculations (see draft District policy "Calculation of the Potential to Emit for VOC Emissions from Wine Fermentation and Storage Operations" in Appendix B):

- a. Potential fermentation emissions from white wine production are first determined:

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

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

$$W1 = C \times D_w \times M \text{ (limited by crusher capacity)}$$

$$W2 = P \times D_w \times M \text{ (limited by pressing capacity)}$$

$$W3 = (V_{FW} \times D_w) / W_{FW} \text{ (limited by white fermenter volume)}$$

$$W4 = (V_T \times D_w) / R_{TW} \text{ (limited by overall tank processing)}$$

where,

C = grape crushing capacity = 10,368 tons/day

D_w = days in a white wine crush season = 120 days

M = amount of grape juice produced per ton of grapes crushed = 200 gallons

P = pressing capacity = 14,740 tons per day

W_{FW} = White fermentation period = 10 days

R_{TW} = Total winery retention time for white wine, 40 + 10 = 50 days

V_{FW} = total volume of white wine fermenters = 32,381,947 gallons

V_T = Total Winery Cooperage = 32,381,947 gallons

Potential white wine fermentation emissions are then determined by applying the white fermentation emission factor stated in FYI-114:

$$PE_{\text{whitefermentation}} = E_{fw} \times W_W$$

E_{fw} = white wine emission factor = 2.5 lb-VOC/1000 gal

Performing the above calculations yields

$W1 = 248.832$ MG/year (million gals/year)

$W2 = 353.760$ MG/year

$W3 = 369.154$ MG/year

$W4 = 77.717$ MG/year

Selecting $W_W = W4 = 77.717$ MG/year and applying the emission factor for white wine fermentation yields:

$$PE_{\text{whitefermentation}} = 194,293 \text{ lb-VOC/year}$$

- b. Potential fermentation emissions from red wine production are then calculated:

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

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

$$W1 = C \times D_r \times M \text{ (limited by crusher capacity)}$$

$$W2 = P \times D_r \times M \text{ (limited by pressing capacity)}$$

$$W3 = (V_{FR} \times F \times D_r) / R_{FR} \text{ (limited by red fermenter volume)}$$

$$W4 = (V_T \times D_r) / R_{TS} \text{ (limited by overall tank processing)}$$

C = grape crushing capacity = 10,368 tons/day

D_r = days in a red wine crush season = 120 days

F = Fill factor for red wine fermentation = 80%

M = amount of grape juice produced per ton of grapes crushed = 200 gallons

P = pressing capacity = 14,740 tons per day
R_{FR} = Red fermentation period = 5 days
R_{TS} = Total winery retention time for red wine, 40 + 5 = 45 days
V_{FR} = total volume of red wine fermenters = 32,381,947 gallons
V_T = Total Winery Cooperage = 32,381,947 gallons

Potential red wine fermentation emissions are then determined by applying the red fermentation emission factor stated above.

$$PE_{\text{redfermentation}} = E_{\text{fr}} \times W/1,000$$

E_{fr} = red wine emission factor = 6.2 lb-VOC/1000 gal (District Rule 4694)

Performing the above calculations yields

W1 = 248.832 MG/year (million gals/year)
W2 = 353.760 MG/year
W3 = 621.733 MG/year
W4 = 86.352 MG/year

Selecting W_R = W4 = 86.352 MG/year and applying the emission factor for red wine fermentation yields:

$$PE_{\text{redfermentation}} = 535,382 \text{ lb-VOC/year}$$

- c. The facility's emission potentials for fermentation operations is then taken to be the greater of either the white or red emissions potentials determined above.

$$PE_{1E(\text{fermentation})} = \text{greater of } PE_{\text{whitefermentation}} \text{ and } PE_{\text{redfermentation}}$$

$$PE_{1E(\text{fermentation})} = PE_{\text{redfermentation}}$$

$$PE_{1E(\text{fermentation})} = 535,382 \text{ lb-VOC/year}$$

2. Annual potential emissions for fermentation operations from existing plus new tanks

- a. Potential fermentation emissions from white wine production are first determined:

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

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

$$W1 = C \times D_w \times M \text{ (limited by crusher capacity)}$$

$$W2 = P \times D_w \times M \text{ (limited by pressing capacity)}$$

$$W3 = (V_{FW} \times D_w) / W_{FW} \text{ (limited by white fermenter volume)}$$

$$W4 = (V_T \times D_w) / R_{TW} \text{ (limited by overall tank processing)}$$

where,

C = grape crushing capacity = 10,368 tons/day

D_w = days in a white wine crush season = 120 days

M = amount of grape juice produced per ton of grapes crushed = 200 gallons

P = pressing capacity = 14,740 tons per day

W_{FW} = White fermentation period = 10 days

R_{TW} = Total winery retention time for white wine, 40 + 10 = 50 days

V_{FW} = total volume of white wine fermenters = 35,184,947 gallons

V_T = Total Winery Cooperage = 35,184,947 gallons

Potential white wine fermentation emissions are then determined by applying the white fermentation emission factor stated in FYI-114:

$$PE_{\text{whitefermentation}} = E_{fw} \times W_W$$

E_{fw} = white wine emission factor = 2.5 lb-VOC/1000 gal

Performing the above calculations yields

$W1 = 248.832$ MG/year (million gals/year)

$W2 = 353.760$ MG/year

$W3 = 401.108$ MG/year

$W4 = 84.444$ MG/year

Selecting $W_W = W4 = 84.444$ MG/year and applying the emission factor for white wine fermentation yields:

$$PE_{\text{whitefermentation}} = 211,110 \text{ lb-VOC/year}$$

- b. Potential fermentation emissions from red wine production are then calculated:

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

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

$$W1 = C \times D_r \times M \text{ (limited by crusher capacity)}$$

$$W2 = P \times D_r \times M \text{ (limited by pressing capacity)}$$

$$W3 = (V_{FR} \times F \times D_r) / R_{FR} \text{ (limited by red fermenter volume)}$$

$$W4 = (V_T \times D_r) / R_{TS} \text{ (limited by overall tank processing)}$$

C = grape crushing capacity = 10,368 tons/day

D_r = days in a red wine crush season = 120 days

F = Fill factor for red wine fermentation = 80%

M = amount of grape juice produced per ton of grapes crushed = 200 gallons

P = pressing capacity = 14,740 tons per day

R_{FR} = Red fermentation period = 5 days

R_{TS} = Total winery retention time for red wine, 40 + 5 = 45 days

V_{FR} = total volume of red wine fermenters = 35,184,947 gallons

V_T = Total Winery Cooperage = 35,184,947 gallons

Potential red wine fermentation emissions are then determined by applying the red fermentation emission factor stated above.

$$PE_{\text{redfermentation}} = E_{fr} \times W / 1,000$$

E_{fr} = red wine emission factor = 6.2 lb-VOC/1000 gal (District Rule 4694)

Performing the above calculations yields

$W1 = 248.832$ MG/year (million gals/year)

$W2 = 353.760$ MG/year

$W3 = 675.551$ MG/year

$W4 = 93.827$ MG/year

Selecting $W_R = W_4 = 93.827$ MG/year and applying the emission factor for red wine fermentation yields:

$$PE_{\text{redfermentation}} = 581,727 \text{ lb-VOC/year}$$

- c. The facility's potential emissions for fermentation operations is then taken to be the greater of either the white or red PE's determined above.

$$PE_{2T(\text{fermentation})} = \text{greater of } PE_{\text{whitefermentation}} \text{ and } PE_{\text{redfermentation}}$$

$$PE_{2T(\text{fermentation})} = PE_{\text{redfermentation}}$$

$$PE_{2T(\text{fermentation})} = 581,727 \text{ lb-VOC/year}$$

3. PE_{2N} for New Tanks

PE_{2N} is calculated as the difference between the post project and pre project potential emissions based on physical capacity:

Potential Emissions Based on Physical Capacity of Wine Processing Equipment		
	Fermentation	Total
Pre Project	535,382	535,382
Post Project	581,727	581,727
$PE_{2N(\text{Fermentation})}$		46,345

Attachment G

Draft Policy for Calculation of Winery Emissions

DRAFT

TO: Permit Services Division Staff

FROM: Dennis Roberts

DATE: June 30, 2009

SUBJECT: Calculation of the Potential to Emit for VOC Emissions from Wine Fermentation and Storage Operations

Purpose

The purpose of this policy is to establish a framework for calculating the collective Potential to Emit for VOCs from wine fermentation and storage tanks which have been previously permitted by in-house Permits to Operate based on loss-of-exemption. Such calculation is primarily performed for purposes of establishing the collective Pre-Project Potential to Emit (PE1) to form the basis for a Specific Limiting Condition (SLC) on all wine tanks at a facility which limits PE2 = PE1.

Applicability

This policy applies to all wine fermentation and storage operations.

Background

The District began issuing permits for wine fermentation and storage tanks on August 21, 2005. In-house PTO's were issued for existing tanks based on a loss or exemption and therefore the tank permits were not subject to New Source Review. Currently, majority of all wine tank permits in the San Joaquin Valley are still in-house PTO's and thus do not contain emission limits such as they would have if subjected to New Source Review (NSR).

Due to changing consumer tastes, the wine industry in the San Joaquin Valley is changing from the production of wines typically made in large tanks to the production of wine in smaller tanks, using smaller batches of select grapes and smaller fermentation batch sizes, with the objective of producing higher quality wines. To produce the same volume of wine in this manner requires more tanks and smaller tanks. Permitting of additional new, smaller wine fermentation and storage tanks could require the purchase of emissions offsets, even in those cases when a winery is just changing to smaller lot production and overall production is not increasing. Where all tanks meet the requirements for Best Available Control Technology (BACT), a potential permitting approach for adding tanks to a facility, for purposes of product flexibility and without triggering offsets, is to establish an SLC on all the tanks which limits the collective annual PE2 to the calculated collective PE1 for all the existing tanks. Since all units meet BACT, Baseline Emissions (BE) are equal to PE1 and calculated offsets are thus zero pursuant to Rule 2201.

The tanks at a winery are highly interdependent in operation and in the absence of a pre-established permit limit they cannot be considered as independent emissions units. By their nature, the various tank operations which convert crushed grapes into finished wine (fermentation, pressing, racking, filtration, etc.) cannot be all conducted in a single tank. In addition, other associated equipment such as that required for

crushing and pressing may serve to limit wine production by the facility. Therefore, a calculation of the PE for wine tanks requires that the tanks be considered in terms of a collective wine production capacity and that other production bottlenecks such as crushing and pressing limitations also be considered. This policy provides a theoretical basis and methodology for performing such a calculation.

Wine Production Process Description

- The VOC emissions associated with winemaking are produced from two separate operations:
 1. Wine Fermentation (a chemical reaction process which converts sugar into ethanol)
 2. Storage Tank Operations during which post-fermentation operations such as racking, cold stabilization, filtration, etc., are also conducted.

Typically, all tanks in a winery are used for both purposes; thus a wine tank commonly consists of two separate emissions units.

- A general process description for wine production is given in U.S. EPA AP-42 Section 9.12.2. There are many variations to the basic process that reflect the individuality of the winemaking and which may be considered proprietary at most facilities. Some additions to the AP-42 description: White wines are fermented without the grape solids, which minimizes the amount of solids settling out in the fermentation tank, allowing white wine to potentially be fermented in any wine tank.
- Red wine is generally fermented with the grape solids which give the red color and other distinctive characteristics to the wine. Because of the solids settling out with red wine fermentation, specialized red wine fermentation tanks with sloped bottoms or constructed as a horizontal rotating drums are generally used to ease solids removal during tank cleaning.
- The tanks in a winery are highly interdependent in operation and therefore must be considered in terms of the collective production capacity. The fermentation capacity of a facility is not only a function of the capacity of the tanks actually performing fermentation but is also a function of the downstream storage tank capacity which may serve to bottleneck the upstream fermentation operation. The wine production process flow diagram in U.S. EPA AP-42 Figure 9.12.2.-1 is illustrative. Post fermentation operations such as cold stabilization, filtration, malolactic fermentation, etc., have historically required a post fermentation residence time in storage tanks of 40 days or less.
- The facility's grape crushing/destemming and pressing equipment may serve to bottleneck the overall operation, establishing the PE by limiting daily throughput of the facility or of individual fermentation tanks.
- Wine production in the San Joaquin Valley is a seasonal event, coinciding with the grape harvest season ("crush season"). Wine production typically occurs in the months of August through December. Fermentation is at its peak during

September through October; about 74% of wine fermentation occurs within those months in the San Joaquin Valley.

Basis and Assumptions for PE Calculation

- Since the annual emissions from a winery operation are proportional to the annual wine production, the basic approach for calculating the PE for a winery operation is to determine the limiting factor for wine production at the facility and base the calculation on this factor. The following items are considered in determination of the actual "bottleneck" to wine production at a facility:

Grape Crushing/Destemming Capacity: Daily production is limited by the facility's capacity to receive and crush grapes. This capacity is established by the manufacturer's rated crushing capacity in tons per hour for the crushing equipment actually located at the facility.

Wine Pressing Capacity: Following crushing, the grape skins must be separated from the wine in the presses. For white wines, this occurs immediately after crushing. For red wines, pressing is performed after the fermentation step. This capacity is established by the manufacturer's rated pressing capacity in tons per hour for the pressing equipment actually located at the facility.

Winery Tank Capacity: Due to the highly inter-related operation of winery tanks, the collective production capacity of winery tankage, in terms of a required collective "minimum residence time" for wine processing, is the basis for the calculation rather than a consideration of the sum of individual theoretical production capacities for each tank. The capacity of the available tankage to produce both red and white wines is considered separately and the scenario which produces the highest potential emissions is considered to be the facility's basis for calculating the PE based on storage tanks limitations.

- The crushing of grapes is assumed to produce 200 gallons of produced wine based on data provided by The Wine Institute.
- Batch fermentation processing is assumed to require a 5 day turnaround for a red wine fermentation tank and a 10 day turnaround for white wine, i.e., a red wine fermenter can produce a batch every 5 days while a white wine fermenter can produce a batch every 10 days. These durations were previously established as a result of information provided by the Wine Institute during development of District Rule 4694 – *Wine Fermentation and Storage Tanks*.
- Post-fermentation processing is assumed to require a maximum of 40 days of retention time based on estimates by The Wine Institute (this duration may be less at some facilities depending upon the products and operating philosophy). This retention time accounts for the tank residence time required for post-fermentation processing such as malolactic fermentation, bentonite addition, filtration(s), blending(s), tartrate stabilization, bottling/packaging or bulk shipping.

- Maximum batch size in a red wine fermenter is 80% of nominal tank capacity due to potential expansion of the fermentation mass during operation as a result of rapid evolution of CO₂ from the fermentation reaction. White wine fermentation batches are assumed to be 100% of the tank's nominal capacity.
- Emission factors for wine fermentation are taken from District Rule 4694 as follows:

6.2 lb-VOC/1000 gallons produced red wine
2.5 lb-VOC/1000 gallons produced white wine

- Emissions from post-fermentation storage tank operations will be calculated based on 8 inter-tank transfers during post-fermentation operations. The number of inter-tank transfers is at least 8 for wine fermented on-site per information provided by the Wine Institute. Each batch of wine is moved for the following processing operations at a minimum : 1) from fermentation to storage; 2) coarse filtration, 3) special processing (ex: ion exchange, centrifugation, addition of fining agents), 4) initial blending, 5) fine filtration, 6) final blending, 7) tartrate stabilization, 8) packaging or bulk shipping. (NOTE: The processing may not occur in this order for all wineries).
- Maximum average ethanol content for wine handled in the storage tank operations is 16 volume % (based on Wine Institute estimate for a typical winery).
- The emission factor for wine storage operations is taken from District FYI-114, *Estimating VOC Emissions from Wine Storage Tanks*. Since all tanks are assumed to meet BACT for wine storage, it will be assumed that breathing losses from the storage tanks are negligible since, pursuant to the current District BACT guideline, the tanks must be insulated or have equivalent isolation from significant diurnal impacts. Based on this assumption, the emission factor from FYI-114 is 0.23 lb-VOC/1000 gallons of tank throughput.
- Fermentation is assumed to occur only during the crush season. Based on documentation provided by the Wine institute, the duration of both the red and white wine crush seasons in the San Joaquin Valley is potentially 120 days each.
- Generally, in the absence of other restrictions, all tanks at a facility may be used for white wine fermentation. However, in some wineries, some tanks may have been added to the facility as storage-only tanks through an NSR permitting action subsequent to the initial in-house PTO's. These would not be available for white wine fermentation and their volume must be subtracted from the total tankage capacity to determine the actual white fermenter capacity. White wine production capacity is then calculated by the following general method:

Given total white fermenter capacity V_w and the 10-day batch turnaround for white fermenters as stated above, the daily white fermenter capacity limit W_{w1} (gallons per day) during crush season is:

$$W_{w1} = V_w + 10$$

To determine the potential limitation due to storage tank capacity, the limiting daily white wine production capacity for a collection of fermentation & storage tanks with a total "effective" capacity V_1 gallons may be calculated by considering a total wine residence time = 10 days fermentation + 50 days post-fermentation processing = 50 days total retention time (grape to finished wine). Where the facility does not include storage-only tanks with an NSR throughput limitation as mentioned above, the "effective" total tank capacity is equal to the total capacity of all tanks at the facility. Where the facility has NSR limited storage tanks, an effective total volume is calculated as outlined in Appendix A. The total tank production capacity for white wine W_{w2} (gallons per day) during crush season is then calculated as,

$$W_{w2} = V_1 + 50$$

The actual facility limit for white wine production W_w is then taken as the least of either the white fermenter capacity limit W_{w1} or the total tank capacity for white wine production W_{w2}

- Since the fermentation of red wine requires specialized fermenters, the consideration of the capacity of the winery tankage to produce red wine must consider the fermentation capacity of these specialized red fermenters separately from the total processing capacity of the tanks. The smallest of either the red fermenter capacity or the total red wine processing capacity of the tanks is taken to be the red wine production limit for the facility:

Given total red fermenter capacity V_r and the 5-day batch turnaround for red fermenters as stated above, the daily red fermenter capacity limit W_{r1} (gallons per day) during crush season is:

$$W_{r1} = V_r + 5$$

To determine the potential limitation due to storage tank capacity, the limiting daily red wine production capacity for a collection of fermentation & storage tanks with a total "effective" capacity V_1 gallons may be calculated by considering a total wine residence time = 10 days fermentation + 50 days post-fermentation processing = 50 days total retention time (grape to finished wine). Note that the total tank volume is an "effective" volume as described above for white wine. The total tank production capacity for red wine W_{r2} (gallons per day) during crush season is then calculated as,

$$W_{r2} = V_1 + 45$$

The actual maximum daily capacity for red wine production W_r is then taken as the least of either the red fermenter capacity limit W_{r1} or the total tank capacity for red wine production W_{r2}

Calculation Model Sequence:

The Potentials to Emit for both a facility's wine fermentation operations and for the facility's storage tank operations are determined in the following sequence:

1. Potential fermentation emissions from a 100% white wine production scenario are first determined:

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

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

$$W1 = C \times D_w \times M \text{ (limited by crusher capacity)}$$

$$W2 = P \times D_w \times M \text{ (limited by pressing capacity)}$$

$$W3 = (V_{FW} \times D_w) / W_{FW} \text{ (limited by white fermenter volume)}$$

$$W4 = (V_T \times D_w) / R_{TW} \text{ (limited by overall tank processing)}$$

C = grape crushing capacity, tons/day

D_w = days in a white wine crush season = 120 days

M = gallons of grape juice produced per ton of grapes = 200 gallons/ton

P = pressing capacity, tons per day

W_{FW} = White fermentation period = 10 days

R_{TW} = Total winery retention time for white wine, 40 + 10 = 50 days

V_{FW} = total volume of white wine fermenters

V_T = Effective Total Winery Cooperage (gal) for white wine – see Appendix A

Potential white wine fermentation emissions are then determined by applying the white fermentation emission factor to the production capacity determined above:

$$PE_{\text{whitefermentation}} = E_{fw} \times W_W$$

where,

E_{fw} = white wine emission factor = 2.5 lb-VOC/1000 gal (District Rule 4694)

2. Potential fermentation emissions from a 100% red wine production scenario are then determined:

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

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

$$W1 = C \times D_r \times M \text{ (limited by crusher capacity)}$$

$$W2 = P \times D_r \times M \text{ (limited by pressing capacity)}$$

$$W3 = (V_{FR} \times F \times D_r) / R_{FR} \text{ (limited by red fermenter volume)}$$

$$W4 = (V_T \times D_r) / R_{TS} \text{ (limited by overall tank processing)}$$

C = grape crushing capacity, tons/day

D_r = days in a red wine crush season = 100 days

F = Fill factor for red wine fermentation = 80%

M = gallons of grape juice produced per ton of grapes = 200 gallons/ton

P = pressing capacity, tons per day

R_{FR} = Red fermentation period = 5 days

R_{TS} = Total winery retention time for red wine, $40 + 5 = 45$ days

V_{FR} = total volume of red wine fermenters

V_T = Effective Total Winery Cooperage (gal) for red wine – see Appendix A

Potential red wine fermentation emissions are then determined by applying the red fermentation emission factor to the production capacity determined above:

$$PE_{\text{redfermentation}} = E_{fr} \times W_R$$

where,

E_{fr} = red wine emission factor = 6.2 lb-VOC/1000 gal (District Rule 4694)

3. The facility's PE for fermentation operations is then taken to be the greater of either the white or red PE's determined above.

$$PE_{\text{fermentation}} = \text{greater of } PE_{\text{whitefermentation}} \text{ and } PE_{\text{redfermentation}}$$

4. Emissions from storage tank operations are then determined for both the red and white wine production cases by applying the factors described above.

$$PE_{\text{whitestorage}} = E_s \times T \times W_W$$

$$PE_{\text{redstorage}} = E_s \times T \times W_R$$

E_s = wine storage emission factor based on District FYI-114 = 0.230 lb-VOC/1000 gallons of wine transferred

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

The facility's PE for storage tank operations is taken to be the larger of the PE's for either red or white wine production.

$$PE_{\text{storage}} = \text{greater of } PE_{\text{whitestorage}} \text{ and } PE_{\text{redstorage}}$$

Example:

The wine production Potentials to Emit for VOCs will be determined for a hypothetical Winery. The hypothetical winery has in-house Permits to Operate for all its wine tanks for operation as both fermenters and storage tanks except for eight (8) 60,000 gallon wine storage-only tanks (480,000 gallons total) which were permitted by an NSR action subsequent to the initial permitting. The eight storage-only tanks are limited by an SLC to a total annual throughput of 2,000,000 gallons per year with a maximum ethanol content of 14%. All fermentation and storage tanks meet Achieved-in-Practice BACT. Crushing and pressing equipment ratings are 150 and 100 tons per hour respectively.

The effective tank capacities and the wine grape processing equipment are summarized as follows:

- Effective Total Tankage Capacity = 14,625,000 and 14,614,000 gallons for white and red wine respectively = V_T (see Appendix A)
- Red Fermenter Capacity = 2,000,000 gallons = V_{FR}
- White Fermenter Capacity = total cooperage – storage only tanks = 14,520,000 gallons

- All storage tanks are insulated and equipped with PVRV's (storage tank breathing losses may be ignored).
- Crushing Capacity = 3,600 tons per day (150 tons/hour) = C
- Pressing Capacity = 2,400 tons per day (100 tons per hour) = P

1. Scenario 1 (all white):

$$W1 = C \times D_w \times M = 3,600 \times 120 \times 200 = 72.0 \text{ MG/yr (million gallons per year)}$$

$$W2 = P \times D_w \times M = 2,400 \times 120 \times 200 = 48.0 \text{ MG/yr}$$

$$W3 = (V_{FW} \times D_w) / W_{FW} = (14,520,000 \times 120) / 10 \\ = 174 \text{ MG/yr}$$

$$W4 = (V_T \times D_w) / R_{TW} = (14,625,000 \times 120) / 50 \\ = 35.1 \text{ MG/yr}$$

Taking the lesser of the four:

$$W_w = W2 = 35.1 \text{ MG/yr}$$

Then,

$$PE_{\text{whitefermentation}} = E_w \times W / 1,000 = 2.5 \times 35.1 \times 10^6 / 1000 = 87,750 \text{ lb-VOC/year}$$

2. Scenario 2 (all red)

$$- W1 = C \times D_r \times M = 3,600 \times 120 \times 200 = 72.0 \text{ MG/yr}$$

$$- W2 = P \times D_r \times M = 2,400 \times 120 \times 200 = 48.0 \text{ MG/yr}$$

$$- W3 = (V_{FR} \times F \times D_r) / R_{FR} = (2,000,000 \times 80\% \times 120) / 5 = 38.4 \text{ MG/yr}$$

$$- W4 = V_T \times D_r / R_S = 14,614,000 \times 120 / 45 = 39.0 \text{ MG/yr}$$

Taking the lesser of the four:

$$W_r = W2 = 38.4 \text{ MG/yr}$$

Then,

$$PE_{\text{redfermentation}} = E_r \times W / 1,000 = 6.2 \times 38.4 \times 10^6 / 1000 = 238,080 \text{ lb-VOC/year}$$

3. Establish PE for fermentation

$$PE_{\text{fermentation}} = \text{greater of } PE_{\text{whitefermentation}} \text{ and } PE_{\text{redfermentation}}$$

$$PE_{\text{fermentation}} = 238,080 \text{ lb-VOC/year}$$

4. Calculate PE for Storage Operations

Since the calculated wine production rates have already considered the limitation introduced by the NSR limit on the storage-only tanks, no further consideration of throughput capacity is required for calculation the PE for storage operations. However, the storage-only tanks are limited to 14% ethanol for their maximum throughput of 2,000,000 gallons which requires a different emission factor. Per FYI-114, an emission factor of 0.198 lb-VOC/1000 gallons is applicable. Since the potential production of red wine is

greater than that of white as calculated above, storage throughput will be based on this production value (38.4 MG/yr) and a minimum of 8 transfers per gallon of wine:

$$PE_{\text{storage}} = E_s \times T \times W_R = 0.23/1000 \times (8 \times 38.4 - 2.0) \times 10^6 \\ + (0.198/1000) \times 2.0 \times 10^6 = 70,592 \text{ lb-VOC/year}$$

Appendix A

Calculation of Effective Tank Volume

Most wine tanks in the District have been permitted as in-house PTO's and thus have no NSR limitations on their operation. However, subsequent to the initial permitting action, some wineries may have added storage tanks, permitted under NSR, either as Routine Replacements or as Fully Offset Units. These tanks are subject to throughput limits and thus may have an impact on the overall production capacity of the winery. To evaluate this impact within the calculation model presented in this policy, it is necessary to determine an "effective volume" which represents the total volume of the tankage at the facility and allows the calculation model to account for any limitation on production capacity resulting from the NSR limit on these additional tanks. The correction procedure is based on comparing the maximum number of annual tank turns (throughput expressed as the number of tank volumes per year) allowed for the NSR-limited tanks with the average minimum number of tank turns required to process the facility throughput based on residence time considerations only. Note that when a minimum of eight wine transfers during storage (per the calculation model) are considered for each gallon of wine produced, the minimum average number of tank turns is independent of the total capacity of the tanks and is established from the tank production capacity equation as follows:

White Wine:

$$W4 = (8 \times (V_T \times D_w) / R_{TW}) + V_T = (8 \times D_w / R_{TW}) = 8 \times 120/50 = 19.2 \text{ turns}$$

Red Wine:

$$W4 = (8 \times (V_T \times D_r) / R_{TR}) + V_T = (8 \times D_r / R_{TR}) = 8 \times 120/45 = 21.3 \text{ turns}$$

When the maximum number of turns allowed for certain NSR-permitted storage tanks is less than this average, these tanks are assumed to limit production capacity and an effective volume for these tanks, used for purposes of determining production capacity, must be determined. The actual volume of the NSR-limited tanks is adjusted by the ratio of the maximum allowed number of turns to the average minimum number of tank turns. This adjusted volume is used, in turn, to determine the effective volume of all tankage at the facility. The following example illustrates the correction:

Volume Correction Example

Using the example PE calculation presented in this policy, total tankage capacity is 15,000,000 gallons which includes 480,000 gallons of storage tanks limited to 2,000,000 gallons per year. The 2,000,000 gallon per year limitation for the NSR-limited tanks limits the number of turns for these tanks to:

$$2,000,000 \text{ gal/yr} \div 480,000 \text{ gal/turn} = 4.2 \text{ turns}$$

The effective capacity for wine production for the NSR-limited tanks is considered to be limited to the extent that the maximum allowable number of turns is less than the minimum average number of turns required for wine production. Therefore, the effective volume for these tanks is considered to be:

$(4.2/19.2) \times 480,000 = 105,000$ gallons for white wine production

$(4.2/21.3) \times 480,000 = 94,600$ gallons for red wine production

Total tank capacity for the facility is then adjusted to an effective value by deducting the storage-only tanks from the total and then adding back the effective volume of the storage-only tanks, or

$V_{\text{effective}} = 15,000,000 - 480,000 + 105,000 = 14,625,000$ gallons for white wine

$V_{\text{effective}} = 15,000,000 - 480,000 + 94,600 = 14,614,000$ gallons for red wine

Attachment H

O'Neill Beverages Company Statewide Compliance
Certification



Received

MAR 14 2011

Permits Svcs
SJVAPCD

March 14, 2011

Via [Email]

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

Re: O'Neill Beverage Co., LLC – Application for Significant Modification

Dear Mr. Roberts:

This letter is provided in response to your email to me dated March 14, 2011 concerning O'Neill Beverages Co., LLC (O'Neill) application (Application) to the San Joaquin Valley Air Pollution Control District (District) for a significant modification. Other than the Parlier, California facility which is subject to the Application, neither O'Neill, nor any entity which controls, is controlled by, or is under common control with O'Neill owns or operates any "major stationary source" (as defined by the federal Clean Air Act, Title 42 United States Code, sections 7401 *et seq.*, for purposes of District Rule 2201, section 4.15.2) within the State of California. The Parlier, California facility is in compliance will all applicable emission limitations and standards.

Please feel free to contact me at (559) 638-3544 with any questions or concerns.

Sincerely,

Matthew S. Towers
Chief Operating Officer
O'Neill Vintners & Distillers

Attachment I

Health Risk Assessment Summary

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Dustin Brown, AQE – Permit Services
 From: Trevor Joy, AQS – Technical Services
 Date: June 2, 2011
 Facility Name: O'Neill Beverage
 Location: 8418 S. Lac Jac Avenue, Parlier
 Application #(s): C-629-432-0 through 493-0
 Project #: 1103740

A. RMR SUMMARY

RMR Summary			
Categories	Wine Storage Tanks (Units 432-0 to 493-0)	Project Totals	Facility Totals
Prioritization Score	0.00*	0.00*	0.00
Acute Hazard Index	N/A	N/A	N/A
Chronic Hazard Index	N/A	N/A	N/A
Maximum Individual Cancer Risk (10⁻⁶)	N/A	N/A	N/A
T-BACT Required?	No		
Special Permit Conditions?	No		

*A prioritization was not performed after reviewing the project. No further analysis was required.

I. Project Description

On May 24, 2011 Technical Services performed a Risk Management Review for sixty two new 15,900 gallon capacity wine storage tanks.

II. Analysis

Technical Services reviewed the project as submitted for toxic hazardous air pollutants (HAPs). At this time, no Emission Factors have been developed and approved by the District for wine fermentation and storage tanks. Therefore, no prioritization was performed for this project; and no further analysis was necessary.

III. Conclusion

The effective prioritization score for this project is 0.00. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

Attachment J

Draft ATC's

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-432-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

15,900 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R009) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

DRAFT

DAVID WARNER, Director of Permit Services

C-629-432-0: Jun 8 2011 9:04AM -- BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
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8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 63,600 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
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19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
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21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-432-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

15,900 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R009) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
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CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director APCO

DRAFT

DAVID WARNER, Director of Permit Services

C-629-432-0 : Jun 8 2011 11:52AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
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CONDITIONS CONTINUE ON NEXT PAGE

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DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-433-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

15,900 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0010) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

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CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director APCO

DAVID WARNER, Director of Permit Services

C-629-433-0 : Jun 8 2011 11:52AM - BROWND : Joint Inspection NOT Required

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CONDITIONS CONTINUE ON NEXT PAGE

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DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-434-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

15,900 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0011) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

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DRAFT

DAVID WARNER, Director of Permit Services

C-629-434-0: Jun 9 2011 11:52AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 63,600 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-435-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

15,900 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0012) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-435-0 - Jun 6 2011 11:53AM - BROWND - Joint Inspection NOT Required

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 63,600 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: C-629-436-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

44,800 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0013) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '-493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-436-0 : Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 135,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

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CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-437-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

44,800 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0014) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-437-0 - Jun 8 2011 11:53AM - BROWND : Joint Inspection NOT Required

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 135,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-438-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

44,800 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0015) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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

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DAVID WARNER, Director of Permit Services

C-629-438-0 - Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 135,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: C-629-439-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

44,800 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0016) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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

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DAVID WARNER, Director of Permit Services

C-629-439-0; Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 135,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

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CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-440-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

37,500 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0023) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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

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DAVID WARNER, Director of Permit Services

C-629-440-0: Jun 8 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 150,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-441-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

37,500 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0024) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-441-0; Jun 8 2011 11:53AM - BROWND : Joint Inspection NOT Required

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 150,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-442-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC
MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

37,500 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0025) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-442-0 : Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 150,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-443-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

37,500 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0026) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-443-0 : Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 150,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

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CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-444-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

8,500 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0027) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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

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DAVID WARNER, Director of Permit Services

C-629-444-0; Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 42,500 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-445-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC
MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

37,500 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0028) WITH PRESSURE/VACUUM VALVE, LOCATED IN CLIMATE-CONTROLLED BUILDING

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-445-0 : Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 150,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

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CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: C-629-446-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

87,000 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0069) WITH PRESSURE/VACUUM VALVE AND INSULATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-446-0 : Jun 6 2011 11:53AM -- BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 261,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-447-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

87,000 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0070) WITH PRESSURE/VACUUM VALVE AND INSULATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-447-0 : Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 261,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: C-629-448-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

87,000 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0071) WITH PRESSURE/VACUUM VALVE AND INSULATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-448-0; Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 261,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-449-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

87,000 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0072) WITH PRESSURE/VACUUM VALVE AND INSULATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-449-0 - Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 261,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-450-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

87,000 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0073) WITH PRESSURE/VACUUM VALVE AND INSULATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-450-0: Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 261,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

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CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: C-629-451-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

87,000 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0074) WITH PRESSURE/VACUUM VALVE AND INSULATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '-493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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

DRAFT

DAVID WARNER, Director of Permit Services

C-629-451-0: Jun 9 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 261,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-452-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC
MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

87,000 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0075) WITH PRESSURE/VACUUM VALVE AND INSULATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '-493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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

DRAFT

DAVID WARNER, Director of Permit Services

C-629-452-0 : Jun 8 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 261,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-453-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

87,000 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0076) WITH PRESSURE/VACUUM VALVE AND INSULATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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

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DAVID WARNER, Director of Permit Services

C-629-453-0: Jun 8 2011 11:53AM -- BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 261,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

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CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-454-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

87,000 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0077) WITH PRESSURE/VACUUM VALVE AND INSULATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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

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DAVID WARNER, Director of Permit Services

C-629-454-0 : Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 261,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

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CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-455-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC
MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

87,000 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0078) WITH PRESSURE/VACUUM VALVE AND INSULATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-455-0 - Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 261,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-629-456-0

LEGAL OWNER OR OPERATOR: O'NEILL BEVERAGES CO LLC

MAILING ADDRESS: 8418 S LAC JAC AVE
PARLIER, CA 93648-9708

LOCATION: 8418 S LAC JAC AVE
PARLIER, CA 93648

EQUIPMENT DESCRIPTION:

87,000 GALLON RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK (TANK # R0079) WITH PRESSURE/VACUUM VALVE AND INSULATION

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating any piece of equipment under Authorities to Construct C-629-432-0 through '-493-0, permittee shall provide VOC emission reduction credits for the following quantities of emissions: 1st quarter - 2,333 lb; 2nd quarter - 2,333 lb; 3rd quarter - 2,333 lb; and 4th quarter - 2,334 lb. Offsets shall be provided at a distance ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC certificate number (or any splits from this certificate) S-3571-1 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 (ATC) shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of the ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
5. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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-629-456-0 : Jun 6 2011 11:53AM - BROWND : Joint Inspection NOT Required

6. When used for wine storage, this tank shall be equipped with and operated with a pressure-vacuum relief valve, which shall operate within 10% of the maximum allowable working pressure of the tank, operate in accordance with the manufacturer's instructions, and be permanently labeled with the operating pressure settings. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
7. When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, except when the operating pressure of the tank exceeds the valve set pressure. A gas-tight condition shall be determined by measuring the gas leak in accordance with the procedures in EPA Method 21. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
8. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. For each batch of wine, the operator shall achieve the storage temperature of 75 degrees Fahrenheit or less within 60 days after completing fermentation, and shall maintain records to show when the required storage temperature of 75 degrees Fahrenheit or less was achieved. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
9. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 degrees Fahrenheit, calculated as the average of all temperature measurements for the batch taken at least every 12 hours over the course of the fermentation. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emissions for fermentation operations in this tank shall not exceed 3.46 lb/day per 1000 gallons of tank capacity. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation operations at this facility shall not exceed 410,502 pounds per year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from wine fermentation operations shall be determined by the following formula: Total annual VOC emissions = [(Total Annual Red Wine Production-gal) x (6.2 lb-VOC/1000 gal)] + [(Total Annual White Wine Production-gal) x (2.5 lb-VOC/1000 gal)]. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Ethanol content of the wine stored in this tank shall not exceed 23.9 percent, by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum wine storage throughput in this tank shall not exceed 261,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Combined annual VOC emissions from all storage operations under permit units C-629-432 through C-629-493 shall not exceed 9,333 pounds per year. [District Rule 2201]
16. The annual VOC wine storage emission factor for each wine ethanol content shall be calculated using the following equation: $EF = 1.705259 * P^{1.090407}$; where EF is the VOC emission factor in pounds of VOC per 1000 gallons of wine throughput; and P is the volume percent ethanol of the wine being transferred. [District Rule 2201]
17. Combined annual VOC emissions from wine storage operations under permit units C-629-432 through C-629-493 shall be determined as the sum of the emissions for each individual wine movement based on the volume transferred in each wine movement and the batch-specific wine storage emission factor calculated using the equation(s) specified within this permit. [District Rule 2201] Federally Enforceable Through Title V Permit
18. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, the average fermentation temperature and the uncontrolled fermentation emissions and fermentation emission reductions (calculated per the emission factors given in District Rule 4694). The information shall be recorded by the tank Permit to Operate number and by wine type, stated as either red wine or white wine. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
19. Separate annual records each of total red wine and total white wine produced by fermentation at this facility, based on values reported to the Alcohol and Tobacco Tax and Trade Bureau (TTB), U.S. Department of the Treasury, shall be kept. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit
20. When this tank is used for wine storage, daily throughput records, including records of filling and emptying operations, the dates of such operations, a unique identifier for each batch, the volume percent ethanol in the batch, and the volume of wine transferred, shall be maintained. [District Rule 4694]
21. When this tank is used for wine storage, the operator shall record, on a weekly basis, the total gallons of wine contained in the tank and the maximum temperature of the stored wine. [District Rule 4694]

CONDITIONS CONTINUE ON NEXT PAGE

22. The permittee shall maintain records of the combined annual VOC emissions for permit units C-629-432 through C-629-493 and those records shall be updated at least once per month. [District Rule 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 2201 and 4694] Federally Enforceable Through Title V Permit

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