



APR 15 2014

Mr. Paul Franzia
Bronco Wine Company
PO Box 789
Ceres, CA 95307

**Re: Notice of Minor Title V Permit Modification
District Facility # N-1665
Project # N-1141113**

Dear Mr. Franzia:

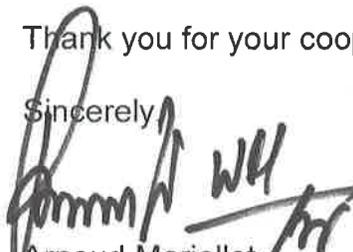
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued N-1665-515-0 into the Title V operating permit. The modification is to install a 146 bhp diesel fired emergency fire pump.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued N-1665-515-0, emission increases and application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Rupj Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1141113

Engineer: Mark Schonhoff
Date: April 15, 2014

Facility Number: N-1665
Facility Name: Bronco Wine Company
Mailing Address: PO Box 789
Ceres, CA 95307

Contact Name: Paul Franzia
Phone: (209) 272-3276

Responsible Official: Paul Franzia
Title: Director of Engineering and Environmental Affairs

I. PROPOSAL

Bronco Wine Company is proposing a Minor Modification to its Title V permit to incorporate Authority to Construct (ATC) N-1665-515-0. The change authorized by the ATC is:

N-1665-515-0: Install a 146 bhp diesel fired emergency fire water pump

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

II. FACILITY LOCATION

6342 Bystrum Road
Ceres, CA

Note – The engine is actually located at 800 Keyes Road, which is immediately adjacent to the main facility address of 6342 Bystrum Road. Therefore, the two addresses are the same Stationary Source as defined in Rule 2201, and the unit was assigned to the Bystrum Road address.

III. EQUIPMENT DESCRIPTION

N-1665-515-1:

146 BHP CUMMINS MODEL CFP5E F50 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A FIRE PUMP

IV. SCOPE OF EPA AND PUBLIC REVIEW

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

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Bronco Wine Company received Authority to Construct N-1665-515-0, which authorized the installation of a 146 bhp diesel fired emergency fire pump. Bronco Wine Company is now proposing to incorporate that Authority to Construct into the facility Title V permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

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

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

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

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

VIII. ATTACHMENTS

- A. Draft Title V Operating Permit N-1665-515-1
- B. Authorities to Construct N-1665-515-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit
N-1665-515-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1665-515-1

EXPIRATION DATE: 04/30/2013

EQUIPMENT DESCRIPTION:

MODIFICATION OF 146 BHP CUMMINS MODEL CFP5E F50 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A FIRE PUMP:

PERMIT UNIT REQUIREMENTS

1. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
2. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
3. Emissions from this IC engine shall not exceed any of the following limits: 2.52 g-NOx/bhp-hr, 0.746 g-CO/bhp-hr, or 0.092 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115] Federally Enforceable Through Title V Permit
4. Emissions from this IC engine shall not exceed 0.098 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. For testing purposes, the engine shall only be operated the number of hours necessary to comply with the testing requirements of the National Fire Protection Association (NFPA) 25 - "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems". Total hours of operation for all maintenance, testing, and required regulatory purposes shall not exceed 100 hours per calendar year. [District Rules 4701, 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. The permittee shall maintain monthly records of emergency and non-emergency operation and of the type of fuel used. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 40 CCR 93115] Federally Enforceable Through Title V Permit
9. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4701, 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Authority to Construct
N-1665-515-0



AUTHORITY TO CONSTRUCT

PERMIT NO: N-1665-515-0

ISSUANCE DATE: 03/13/2014

LEGAL OWNER OR OPERATOR: BRONCO WINE COMPANY

MAILING ADDRESS: P O BOX 789
CERES, CA 95307

LOCATION: 6342 BYSTRUM RD
CERES, CA 95307

EQUIPMENT DESCRIPTION:

146 BHP CUMMINS MODEL CFP5E F50 TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE
POWERING A FIRE PUMP

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
4. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed any of the following limits: 2.52 g-NOx/bhp-hr, 0.746 g-CO/bhp-hr, or 0.092 g-VOC/bhp-hr. [District Rule 2201 and 17 CCR 93115] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-1085-515-0 Mar 13 2014 10:28AM - SCHONHOM Joint Inspection NOT Required

7. Emissions from this IC engine shall not exceed 0.098 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
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11. The permittee shall maintain monthly records of the type of fuel purchased. [District Rule 4702 and 40 CCR 93115] Federally Enforceable Through Title V Permit
12. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4701, 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

ATC	SSIPE (lb/yr)				
	NO _x	VOC	CO	SO _x	PM ₁₀
N-1665-515-0	81	3	24	0	3
TOTAL	81	3	24	0	3

ATTACHMENT D

Application



San Joaquin Valley Air Pollution Control District

www.valleyair.org



Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Bronco Wine Co.</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>PO Box 789</u> CITY: <u>Ceres</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>95307</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>800 Keyes Rd.</u> CITY: <u>Ceres</u> _____ 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: <u>3/18/2014</u>
4. GENERAL NATURE OF BUSINESS: <u>Wine Production</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>Installation of a 145 HP Tier 3 diesel emergency fire pump.</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>Paul W. Franzia</u>	TITLE OF APPLICANT: <u>Dir. of Engineering and Environmental Affairs</u>
7. SIGNATURE OF APPLICANT: 	DATE: <u>3/13/14</u> PHONE: (209)272-3276 FAX: () EMAIL: paul.franzia@broncowine.com

For APCD Use Only:

Bronco Wine Company

N-11665

DATE STAMP RECEIVED <u>MAR 19 2014</u> SJVAPCD NORTHERN REGION	FILING FEE RECEIVED: \$ <u>71.00</u> CHECK#: <u>286403</u> DATE PAID: <u>3/19/14</u> PROJECT NO: <u>N-114113</u> FACILITY ID: <u>N-11665</u>
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San Joaquin Valley Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME: <u>Bronco Wine Co.</u>	FACILITY ID: <u>N-1665</u>
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <u>Bronco Wine Co.</u>	
3. Agent to the Owner: <u>Paul W. Franzia</u>	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Paul W. Franzia
Signature of Responsible Official

4/14/19
Date

Paul W. Franzia
Name of Responsible Official (please print)

Dir. of Eng. & Envir. Affairs
Title of Responsible Official (please print)