



OCT 23 2012

Paul Bement
The Wine Group
2916 South Reed Avenue
Sanger, CA 93657

**Re: Notice of Minor Title V Permit Modification
District Facility # C-120
Project # C-1123101**

Dear Mr. Bement:

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 Permit to Operate C-120-184-0 into the Title V operating permit. The proposed permit unit C-120-184-1 is an existing distilled spirits storage tank which is being issued a permit as a result of loss-of-exemption.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Permit to Operate C-120-184-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Sincerely,

David Warner
Director of Permit Services

Enclosures

Seyed Sadredin

Executive Director/Air Pollution Control Officer

Northern Region

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

Central Region (Main Office)

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

Southern Region

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



OCT 23 2012

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

Re: **Notice of Minor Title V Permit Modification**
District Facility # C-120
Project # C-1123101

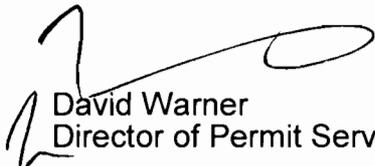
Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. The Wine Group is proposing a Title V minor permit modification to incorporate the recently issued Permit to Operate C-120-184-0 into the Title V operating permit. The proposed permit unit C-120-184-1 is an existing distilled spirits storage tank which is being issued a permit as a result of loss-of-exemption.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Permit to Operate C-120-184-0, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,



David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1123101

Engineer: Dennis Roberts
Date: October 1, 2012

Facility Number: C-120
Facility Name: The Wine Group
Mailing Address: 2916 South Reed Avenue
Sanger, CA 93657

Contact Name: Paul Bement
Phone: (209) 253-5206

Responsible Official: John Stout
Title: Plant Manager

I. PROPOSAL

The Wine Group is proposing a Title V minor permit modification to incorporate the recently issued Permit to Operate C-120-184-0 into the Title V operating permit. Permit C-120-184-0 has been issued to the Wine Group for an existing distilled spirits storage tank previously exempt from permits but which now requires a permit as a result of a loss-of-exemption.

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

2916 South Reed Avenue
Sanger, CA

III. EQUIPMENT DESCRIPTION

**C-120-184-1: 37,658 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 533)
WITH INSULATION**

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

The Wine Group, Inc is proposing a Title V minor permit modification to incorporate the recently issued Permit to Operate C-120-184-0 into the Title V operating permit. This tank was inadvertently omitted in the initial permitting action for wine tanks at this facility. The applicant has submitted evidence that this tank was in operation prior to the date of loss of exemption for winery tanks in the District and therefore, pursuant to District Rule 2020, Section 9.0, the issuance of a Permit to Operate for this tank was based on a loss of exemption and thus is not subject to the requirements of District Rule 2201 (New Source Review).

C-120-184-1:

- Condition 1 of the original permit to operate was deleted since this condition is included as condition 42 of the facility-wide requirements C-120-0-0.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

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

the source would otherwise be subject. Such terms and conditions include;

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

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

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

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. C-120-184-1
- B. Emissions Increases
- C. Application (*delete application with final EE*)
- D. Previous Title V Operating Permit No. C-120-184-0

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
C-120-184-1

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-120-184-1

EXPIRATION DATE: 06/30/2015

EQUIPMENT DESCRIPTION:

37,658 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 533) WITH INSULATION

DRAFT

PERMIT UNIT REQUIREMENTS

See facility-wide requirements for permit conditions applicable to this permit unit.

DRAFT

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

ATTACHMENT B

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-120-184-1	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT C

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: The Wine Group, LLC dba Franzia Sanger	
2. MAILING ADDRESS: STREET/P.O. BOX: 2916 South Reed Avenue CITY: Sanger STATE: CA 9-DIGIT ZIP CODE: 93657	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 2916 South Reed Avenue CITY: Sanger ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: Winery	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) One (1) high-proof tank was overlooked during original permitting action for tanks in 2005 and needs to be grandfathered in. This tank is already permitted for wine storage but needs to be modified to include storage for wine and high proof. This tank was in use prior to 2005. Consult permit number C-120-184-0. 1 @ 37,658	
6. TYPE OR PRINT NAME OF APPLICANT: Paul Bement	TITLE OF APPLICANT: Environmental Engineer
7. SIGNATURE OF APPLICANT: 	DATE: 9/28/2012 PHONE: (209) 253-5206 FAX: (209) 559 - 4217 EMAIL: paul.bement@thewinegroup.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: 1123101 FACILITY ID: C-120

**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
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: The Wine Group, LLC dba Franzia Sanger	FACILITY ID: C - 120
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: The Wine Group, LLC dba Franzia Sanger	
3. Agent to the Owner: John Stout	

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

- JS* Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s).
- JS* Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- JS* Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- JS* 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:

John Stout
Signature of Responsible Official

09/28/2012
Date

JOHN STOUT
Name of Responsible Official (please print)

PLANT MANAGER
Title of Responsible Official (please print)

ATTACHMENT D

Previous Title V Operating Permit No.
C-120-180-0

**San Joaquin Valley
Air Pollution Control District**

PERMIT UNIT: C-120-184-0

EXPIRATION DATE: 06/30/2015

EQUIPMENT DESCRIPTION:

37,658 GALLON DISTILLED SPIRITS STORAGE TANK (TANK 533) WITH INSULATION

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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