



AUG 22 2012

Paul Bement  
Golden State Vintners  
7409 W. Central Avenue  
Fresno, CA 93706

**Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)  
District Facility # C-581  
Project # C-1120539**

Dear Mr. Bement:

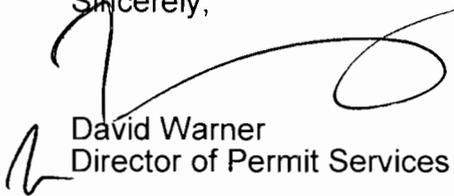
Enclosed for your review is the District's analysis of your application for Authority to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. Golden State Vintners has requested a modification of the permit, correcting the equipment description for permit unit C-581-9 to reflect the historical storage of spirits in the existing wine storage tank.

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

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures  
cc: Dennis Roberts, Permit Services

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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**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



AUG 22 2012

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

Re: **Proposed Authority to Construct / Certificate of Conformity (Minor Mod)**  
**District Facility # C-581**  
**Project # C-1120539**

Dear Mr. Rios:

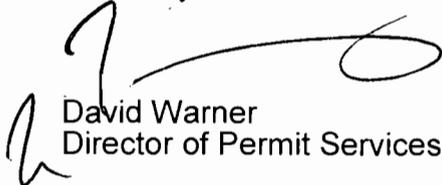
Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for Golden State Vintners, located at 7409 W. Central Avenue in Fresno, which has been issued a Title V permit. Golden State Vintners is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. Golden State Vintners has requested a modification of the permit, correcting the equipment description for permit unit C-581-9 to reflect the historical storage of spirits in the existing wine storage tank.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # Authority to Construct C-581-9-3 with Certificate of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures  
cc: Dennis Roberts, Permit Services

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Executive Director/Air Pollution Control Officer

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### III. PROJECT LOCATION

This facility is located at 7409 W. Central Avenue in Fresno.

### IV. PROCESS DESCRIPTION

Golden State Vintners operates a wine fermentation and storage facility. Distilled spirits, typically called high-proof are received by truck and are stored for purposes of supplementing the ethanol content of produced wines.

### V. EQUIPMENT LISTING

#### Pre-Project Equipment Description

Permit #	Description
C-581-9-2:	20,243 GALLON STAINLESS STEEL WINE FERMENTATION/STORAGE TANK F0022 WITH PRESSURE/VACUUM VALVE AND INSULATION

#### Proposed ATC's:

Permit #	Description
C-581-9-3:	MODIFICATION OF 20,243 GALLON STAINLESS STEEL WINE FERMENTATION/STORAGE TANK F0022 WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD DISTILLED SPIRITS STORAGE OPERATION

#### Post-Project Equipment Description

Permit #	Description
C-581-9-3:	20,243 GALLON STAINLESS STEEL WINE FERMENTATION/STORAGE AND DISTILLED SPIRITS STORAGE TANK F0022 WITH PRESSURE/VACUUM VALVE AND INSULATION

### VI. EMISSION CONTROL TECHNOLOGY EVALUATION

Emissions from the distilled spirits storage tanks are controlled by operating with a pressure/vacuum valve and insulation on the tank. The combination of insulation and pressure/vacuum valve serves to minimize VOC emissions which might result from tank breathing losses. The valve will not let vapor escape from the tank or air to enter the tank until the tank pressure is within 10% of the maximum allowable pressure or vacuum for the tank. Insulation minimizes heating of the tank due to ambient conditions and sunlight.

### VII. GENERAL CALCULATIONS

#### A. Assumptions

- Winery tanks generally consist of three emissions units; 1) a fermentation tank emissions unit, 2) a wine storage tank emissions unit and 3) a spirit storage tank emissions unit. The modifications proposed in this project will only affect the spirit storage emission unit.

- Maximum annual distilled spirits throughput for the tank is 50,000 gallons per year with maximum ethanol content of 98 volume % per applicant.
- Per the applicant, the tank is insulated and equipped with a pressure/vacuum valve.

### **B. Emission Factors**

Since the tank is insulated, equipped with a pressure vacuum valves and operates at ambient temperature, the tabular emission factor given by the District's FYI-114 for 98% ethanol is applicable.

Per FYI-114:

Emission Factor = 0.757 lb-VOC/1000 gallons throughput (for tank located in the Central Region)

### **C. Calculations**

This project does not constitute an NSR modification as defined in Rule 2201 section 3.24 or result in a change in permitted emissions; therefore, NSR calculations are not required. However, annual emissions from distilled spirits storage are determined for reference purposes.

Total annual emissions from distilled spirits storage are:

Annual  $PE_{\text{distilled spirits}} = 50,000 \text{ gallons/year} \times 0.757 \text{ lb-VOC/1000 gallons}$

Annual  $PE_{\text{distilled spirits}} = 38 \text{ lb-VOC/year}$

There is no change to tank's wine fermentation and wine storage operation in this project and these emission units are not modified by this project; therefore, no further discussion is required.

### **D. Major Source Determination**

Pursuant to Section 3.24 of District Rule 2201, a Major Source is a stationary source with post-project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. However, Section 3.24.2 states, "for the purposes of determining major source status, the SSPE2 shall not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site."

This source is an existing Major Source for VOC emissions and will remain a Major Source for VOC. No change in other pollutants are proposed or expected as a result of this project.

### **E. Stationary Source Potential to Emit (SSPE)**

Calculation of the Stationary Source Potential to Emit (SSPE) is traditionally performed in the context of an In-House Permit to Operate for purposes of determining Major Source status of the facility; however, the SSPE for this facility has been previously established and the facility is already an acknowledged Major Source for VOC and therefore SSPE calculations are not required.

## **VIII. COMPLIANCE**

### **District Rule 2020 Exemptions**

The spirits storage operation to be permitted in this facility was installed or had construction initiated prior to August 21, 2005. Prior to that date, the District did not require permits for winery tanks and therefore a permit was not required at the time of installation. As a result this current permit action is due to a loss of exemption, pursuant to Rule 2020, Section 9.0, and therefore will be processed as a PTO application not subject to the requirements of Rule 2201 (New and Modified Stationary Source Review Rule).

### **District Rule 2201 New and Modified Stationary Source Review Rule**

An emission unit that was installed at a time when permits were not required is exempt from the District's NSR Rule for the initial permitting action, per District Rule 2020, Section 9.0. Therefore, as discussed above, this unit is not subject to the requirements of this rule until modified under Rule 2201.

### **District Rule 2520 Federally Mandated Operating Permits**

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

In accordance with Rule 2520, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

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

**District Rule 4102 Nuisance**

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations provided the equipment is well maintained. Therefore, compliance with this rule is expected.

The following condition appears on the facility-wide requirements, C-581-0-1:

- {98} No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]

**District Rule 4694 Wine Fermentation and Storage Tanks**

The purpose of this rule is to reduce emissions of volatile organic compounds (VOC) from the fermentation and bulk storage of wine, or achieve equivalent reductions from alternative emission sources. This rule is applicable to winery fermenting wine and/or storing wine in bulk containers. This project is only to include the historical storage of spirits in the wine tanks and the wine fermentation and storage emission units are not modified by this project; therefore, this rule is not applicable and no further discussion is required.

**District Rule 4695 Brandy Aging and Wine Aging Operations**

The purpose of this rule is to limit volatile organic compound (VOC) emissions from brandy aging and wine aging operations. This project is only related to storage of spirits in steel storage tanks; therefore, this rule is not applicable and no further discussion is required.

**District Rule 4623 Storage of Organic Liquids**

This rule limits VOC emissions from the storage of organic liquids. Per section 4.1.4 of the rule, distilled spirits storage tanks are specifically exempted from the requirements of Rule 4623.

**IX. RECOMMENDATION**

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue Authority to Construct C-581-9-3 subject to the permit conditions on the attached draft Authority to Construct in Appendix III.

**X. BILLING INFORMATION**

<b>ANNUAL PERMIT FEES</b>			
<b>Permit Number</b>	<b>Fee Description</b>	<b>Fee Schedule</b>	<b>Annual Fee</b>
C-581-9-3	20,000 or Greater but Less Than 50,000	3020-05-C	\$135.00

**APPENDICES**

- Appendix I: Current Permit
- Appendix II: Base ATC
- Appendix III: Draft ATC

# **APPENDIX I**

Current Permit

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-581-9-1

**EXPIRATION DATE:** 07/31/2015

**EQUIPMENT DESCRIPTION:**

20,243 GALLON STAINLESS STEEL ENCLOSED TOP WINE FERMENTATION/STORAGE TANK F0022 WITH PRESSURE/VACUUM VALVE

## PERMIT UNIT REQUIREMENTS

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1. When storing wine, 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 Rule 4694, 5.2.1]
2. When this tank is used for storing wine, 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 Rule 4694, 5.2.1]
3. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. 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 Rule 4694, 5.2.2]
4. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, uncontrolled fermentation emissions, and fermentation emission reductions. 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 Rule 4694, 6.4.1]
5. 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, 6.4.2]

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

## **APPENDIX II**

Base ATC



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** C-581-9-2

**ISSUANCE DATE:** 03/28/2012

**LEGAL OWNER OR OPERATOR:** GOLDEN STATE VINTNERS  
**MAILING ADDRESS:** 7409 W CENTRAL AVE  
FRESNO, CA 93706

**LOCATION:** 7409 W CENTRAL AVE  
FRESNO, CA 93706

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 20,243 GALLON STAINLESS STEEL ENCLOSED TOP WINE FERMENTATION/STORAGE TANK F0022 WITH PRESSURE/VACUUM VALVE: ESTABLISH A SPECIFIC LIMITING CONDITION FOR ALL FERMENTATION AND STORAGE TANKS, DESIGNATE THE TANK AS A RED/WHITE WINE FERMENTATION/STORAGE TANK EQUIPPED WITH INSULATION

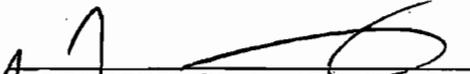
### CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. 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. 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
4. When 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

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  
C581-9-2; Mar 28 2012 2:11PM - ROBERTSD - Joint Inspection NOT Required

5. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. 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
6. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 oF, 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
7. The daily VOC emissions rate for wine fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The ethanol content of wine stored in this tank shall not exceed 23.9 percent by volume. [District Rule 2201] Federally Enforceable Through Title V Permit
9. When this tank is used for wine storage and the tank capacity is greater than or equal to 200,000 gallons, the daily tank throughput shall not exceed the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
10. When this tank is used for wine storage and the tank capacity is less than 200,000 gallons, the daily tank throughput shall not exceed twice the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 435,581 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Combined annual VOC emissions from all wine storage operations 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
13. The annual VOC wine storage emission factor (EF) for each wine transfer shall be selected from the following emission factors based on the ethanol content of the wine transferred: For wine with ethanol content less than or equal to 14 volume percent:  $EF = 0.150 \text{ lb-VOC}/1000 \text{ gallons}$ ; For wine with ethanol content greater than 14 volume percent,  $EF = 0.248 \text{ lb-VOC}/1000 \text{ gallons}$ . [District Rule 2201] Federally Enforceable Through Title V Permit
14. 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
15. For each batch of must fermented in this tank, the operator shall record the fermentation completion date, the total gallons of must fermented, 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
16. 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] Federally Enforceable Through Title V Permit
17. 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 Rules 1070 and 2201]
18. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
19. Separate annual records 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 maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. 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 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

## **APPENDIX III**

### **Draft Authority to Construct**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-581-9-3

**LEGAL OWNER OR OPERATOR:** GOLDEN STATE VINTNERS

**MAILING ADDRESS:** 7409 W CENTRAL AVE  
FRESNO, CA 93706

**LOCATION:** 7409 W CENTRAL AVE  
FRESNO, CA 93706

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 20,243 GALLON STAINLESS STEEL WINE FERMENTATION/STORAGE TANK F0022 WITH PRESSURE/VACUUM VALVE AND INSULATION: ADD DISTILLED SPIRITS STORAGE OPERATION

**CONDITIONS**

1. Authority to Construct (ATC) C-581-9-2 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
3. {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
4. 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
5. When 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

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-581-9-3 : Aug 14 2012 8:01AM - ROBERTSD : Joint Inspection NOT Required

6. The temperature of the wine stored in this tank shall be maintained at or below 75 degrees Fahrenheit. The temperature of the stored wine shall be determined and recorded at least once per week. 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
7. The average fermentation temperature of each batch of must fermented in this tank shall not exceed 95 oF, 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
8. The daily VOC emissions rate for wine fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
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10. When this tank is used for wine storage and the tank capacity is greater than or equal to 200,000 gallons, the daily tank throughput shall not exceed the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
11. When this tank is used for wine storage and the tank capacity is less than 200,000 gallons, the daily tank throughput shall not exceed twice the maximum nominal tank capacity stated on the equipment description. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 435,581 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Combined annual VOC emissions from all wine storage operations 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
14. The annual VOC wine storage emission factor (EF) for each wine transfer shall be selected from the following emission factors based on the ethanol content of the wine transferred: For wine with ethanol content less than or equal to 14 volume percent:  $EF = 0.150 \text{ lb-VOC}/1000 \text{ gallons}$ ; For wine with ethanol content greater than 14 volume percent,  $EF = 0.248 \text{ lb-VOC}/1000 \text{ gallons}$ . [District Rule 2201] Federally Enforceable Through Title V Permit
15. 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
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18. 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 Rules 1070 and 2201]
19. Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
20. Separate annual records 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 maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. 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 1070, 2201 and 4694] Federally Enforceable Through Title V Permit

**DRAFT**