

NOV 17 2009

Drew Scott
RME, Inc. - Woodbridge Winery
P O Box 1260
Woodbridge, CA 95258

**Re: Proposed ATC / Certificate of Conformity (Significant Mod)
Project Number: N-1092377**

Dear Mr. Scott:

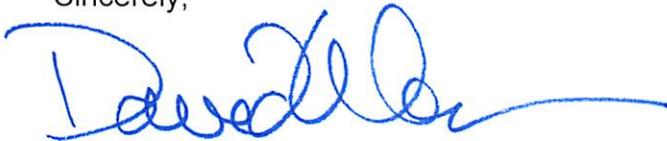
Enclosed for your review and comment is the District's analysis of RME, Inc. - Woodbridge Winery's application for an Authority to Construct for a specific limiting condition (SLC) for wine production operations, 141 new wine fermentation and storage tanks, and modification of 13 existing wine storage tanks, at 5950 E. Woodbridge Road in Acampo, CA.

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the Authorities to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authorities 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.

The public notice will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day public comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jonah Aiyabei of Permit Services at (559) 230-5910.

Sincerely,



David Warner
Director of Permit Services

DW:JKA

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



NOV 17 2009

Mike Tollstrup, Chief
Project Assessment Branch
Stationary Source Division
California Air Resources Board
PO Box 2815
Sacramento, CA 95812-2815

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
Project Number: N-1092377

Dear Mr. Tollstrup:

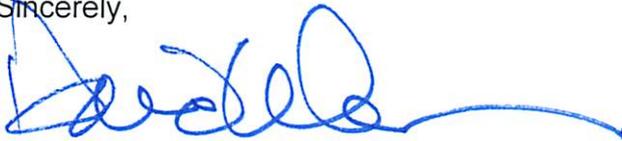
Enclosed for your review and comment is the District's analysis of RME, Inc. - Woodbridge Winery's application for an Authority to Construct for a specific limiting condition (SLC) for wine production operations, 141 new wine fermentation and storage tanks, and modification of 13 existing wine storage tanks, at 5950 E. Woodbridge Road in Acampo, CA. The applicant is requesting that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project.

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

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day public comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jonah Aiyabei of Permit Services at (559) 230-5910.

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NOV 17 2009

Gerardo C. Rios (AIR 3)
Chief, Permits Office
Air Division
U.S. E.P.A. - Region IX
75 Hawthorne Street
San Francisco, CA 94105

**Re: Proposed ATC / Certificate of Conformity (Significant Mod)
Project Number: N-1092377**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of RME, Inc. - Woodbridge Winery's application for an Authority to Construct for a specific limiting condition (SLC) for wine production operations, 141 new wine fermentation and storage tanks, and modification of 13 existing wine storage tanks, at 5950 E. Woodbridge Road in Acampo, CA, which has been issued a Title V permit. RME, Inc. - Woodbridge Winery is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project.

Enclosed is the engineering evaluation of this application with a copy of the current Title V permit and proposed Authorities to Construct with Certificate of Conformity. After demonstrating compliance with the Authorities 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 public comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jonah Aiyabei of Permit Services at (559) 230-5910.

Sincerely,



David Warner
Director of Permit Services

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Stockton Record
Stockton Record

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED ISSUANCE OF
AN AUTHORITY TO CONSTRUCT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Unified Air Pollution Control District solicits public comment on the proposed issuance of Authority to Construct to RME, Inc. - Woodbridge Winery for a specific limiting condition (SLC) for wine production operations, 141 new wine fermentation and storage tanks, and modification of 13 existing wine storage tanks, at 5950 E. Woodbridge Road in Acampo, CA.

The District's analysis of the legal and factual basis for this proposed action, Project #N-1092377, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. This will be the public's only opportunity to comment on the specific conditions of the modification. If requested by the public, the District will hold a public hearing regarding issuance of this modification. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. Written comments on this project must be submitted within 30 days of the publication date of this notice to **DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, 1990 EAST GETTYSBURG AVENUE, FRESNO, CA 93726.**

Winery tanks potentially operate as two separate emissions units; typically they are used for fermentation operations during the crush season and then are used for storage tank operations when not in use as a fermenter. This project is an NSR modification of all the fermentation emissions units in this winery. It is also an NSR modification of certain wine storage emissions units which were permitted under NSR subsequent to the initial permitting action of the wine tanks at this facility (issuance of inhouse PTO's as a result of loss-of-exemption). Existing storage tank emissions units at this facility with Inhouse Permits to Operate are not undergoing a modification by this project as defined in District Rule 2201; however, since all tank permits at this facility will be revised as a result of a modification of the fermentation emission unit associated with each tank, current prohibitory conditions for compliance with District Rule 4694 will be added to the permits as applicable. Copies of existing Permits to Operate and Authorities to Construct are included as Appendix A.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (9/21/06)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4001	New Source Performance Standards (4/14/99)
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4102	Nuisance (12/17/92)
Rule 4694	Wine Fermentation and Storage Tanks (12/15/05)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)	
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines	

III. Project Location

The facility is located at 5950 E. Woodbridge Rd. in Acampo, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Woodbridge Winery Co. produces both red and white table wines, as well as other specialty wine products, from the fermentation of grapes. During the "crush season", typically from late August to late November, both red and white grapes are received by truck and delivered to a crusher-stemmer which serves to crush the grapes and remove the stems. In the case of red wines, the resultant juice (termed "must" and containing the grape skins, pulp and seeds) is pumped to red wine fermentation tanks for fermentation, a batch process. The red wine fermentation tanks are specifically designed to ferment the must in contact with the skins and to allow the separation of the skins and seeds from the wine after fermentation. In the case of white

wines, the must is sent to screens and presses for separation of grape skins and seeds prior to fermentation. After separation of the skins and seeds, the white must is transferred to a fermentation tank. White wine fermentation can be carried out in a tank without design provisions for solids separation since the skins and seeds have already been separated.

After transfer of the must (for red or white wine) to the fermentation tank, the must is inoculated with yeast which initiates the fermentation reactions. During fermentation, the yeast metabolizes the sugar in the grape juice, converting it to ethanol and carbon dioxide while releasing heat. Temperature is typically controlled by refrigeration, and is maintained at 45 - 65 °F for white wine fermentation and 70 - 95 °F for red wine fermentation. The sugar content of the fermentation mass is measured in °Brix (weight %) and is typically 22 – 26° for unfermented grape juice, dropping to 4° or less at the end of fermentation. Finished ethanol concentration is approximately 10 to 14 percent by volume. Batch fermentation requires 3-5 days per batch for red wine and 1-2 weeks per batch for white wine. VOCs are emitted during the fermentation process along with the CO₂. The VOCs consist primarily of ethanol along with small quantities of other fermentation byproducts.

Following the completion of fermentation, white wine is transferred directly to storage tanks. Red wine is first directed to the presses for separation of solids and then routed to the storage tanks. All tanks in the winery typically operate as two separate emissions units: (1) a fermentation operation during which the tank is vented directly to the atmosphere to release the evolved CO₂ byproduct from the fermentation reaction; and (2) a storage operation during which the tank is closed to minimize contact with air and refrigerated to preserve the wine. Post-fermentation operations such as cold stabilization, racking, and filtration are conducted in the tanks, resulting in a number of inter-tank transfers during the period between the end of fermentation and bottling or bulk shipment. Storage operations are conducted year-round. VOC emissions occur primarily as a result of the inter-tank transfers which are necessitated by the post fermentation operations.

V. Equipment Listing

Pre-Project Equipment Description:

The facility currently has 617 tanks, under the categories summarized below, that will be affected by the proposed modifications.

- 26 Concrete red and white wine fermentation and storage tanks - 1,070,018 gallons total.
- 16 Open concrete red and white wine fermentation-only tanks - 624,000 gallons total.
- 40 Redwood red and white wine fermentation and storage tanks - 858,990 gallons total.
- 522 Stainless steel red and white wine fermentation and storage tanks - 49,938,564 gallons total.
- 13 Stainless steel red and white wine storage-only tanks - 554,987 gallons total.

Pre-project equipment descriptions are listed in Appendix B.

Proposed Modification:

- Establish SLC for wine production operations (fermentation and storage) emissions from all wine tanks at the facility.
- Install 141 new stainless steel red and white wine fermentation and wine storage tanks with a total capacity of 2,146,759 gallons (units 652-0 through 792-0).
- Modify 8 existing storage-only tanks (permit units 629-1 through 636-1) as follows: (a) allow both fermentation (red and white wine) and storage; (b) for each tank, increase existing daily storage throughput limit from 62,554 gallons to four times the maximum nominal tank capacity stated in the equipment description; (c) remove existing annual storage throughput limit; and (d) increase ethanol content of wine stored in each tank from 16 to 20 percent by volume.
- Modify 5 existing storage-only tanks (permit units 644-1 through 648-1) as follows: (a) allow both fermentation (red and white wine) and storage; (b) for each tank, increase existing daily storage throughput limit to four times the maximum nominal tank capacity stated in the equipment description; (c) remove existing annual storage throughput limit; and (d) increase ethanol content of wine stored in each tank to 20 percent by volume.
- Administratively correct the equipment descriptions on some permit units currently permitted with in-house Permits to Operate as required to indicate correct tanks usage, control equipment and other existing tank parameters.

Post Project Equipment Description:

After the proposed modifications, the facility will have a total of 734 tanks under the following categories:

- 26 Concrete red and white wine fermentation and storage tanks - 1,070,018 gallons total.
- 16 Open concrete red and white wine fermentation-only tanks - 624,000 gallons total.
- 40 Redwood red and white wine fermentation and storage tanks - 858,990 gallons total.
- 676 Stainless steel red and white wine fermentation and storage tanks - 52,640,310 gallons total.

Post-project equipment descriptions are listed in Appendix C.

VI. Emission Control Technology Evaluation

VOCs (ethanol) are emitted from wine storage tanks as a result of both working losses (which occur when the liquid level in the tank changes) and breathing losses (expansion and contraction effects due to temperature variations). The proposed pressure/vacuum valve limits these emissions by requiring the maximum amount of variation in tank pressure before allowing the tank to vent to the atmosphere or allowing air admission to the tank. When wine

storage tanks are insulated or located in a climate controlled building, breathing losses are considered to be negligible.

No emission controls are currently required on wine fermentation tanks since no technology has been achieved in practice and all identified technologically feasible controls have been determined to not be cost effective.

VII. General Calculations

A. Assumptions

- Each tank generally consists of two emissions units: (1) a fermentation emissions unit, and (2) a storage emissions unit.
- All existing tanks may be used for fermentation of red or white wine, except those designated as storage-only tanks by NSR permit conditions. All tanks may be used for storage of red or white wine, except open-top tanks and those designated as fermentation-only tanks by NSR permit conditions.
- Daily Potential to Emit for both storage and fermentation operations will be calculated on a tank-by-tank basis as outlined in District FYI-114, Estimating VOC Emissions from Wine Storage Tanks.
- For enclosed tanks with refrigeration and/or insulation (or equivalent) and P/V valves, daily breathing losses from storage of wine are assumed to be negligible.
- Pre-project maximum ethanol content of stored wine is 20%, unless stated otherwise on the existing permit.
- Pre-project, all existing tanks at this facility can potentially be used as red or white wine fermentation tanks with the exception of permit units 629-0 through 636-1 and 644-1 through 648-1, which were permitted for storage operations only through NSR permitting actions subsequent to the initial in-house PTO issue. The total tank volume that can potentially be used for wine fermentation is 52,491,572, calculated as total facility tank volume (53,046,559 gallons) minus total volume of storage-only tanks (554,987 gallons).
- Grape crushing capacity at this facility is 13,200 tons per day based on information provided by the applicant.
- Pressing capacity at this facility is 8,400 tons per day based on information provided by the applicant.

- Annual Pre-Project Potential to Emit 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 D.

B. Emission Factors

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

Red Wine Fermentation:

Daily: 3.46 lb-VOC/1000 gallons tank capacity
Annual: 6.2 lb-VOC/1000 gallons annual throughput

White Wine Fermentation

Daily: 1.62 lb-VOC/1000 gallons tank capacity
Annual: 2.5 lb-VOC/1000 gallons annual throughput

Wine Storage Working Losses @ 14% Ethanol

Daily: 0.289 lb-VOC/1000 gallons daily throughput
Annual: 0.198 lb-VOC/1000 gallons annual throughput

Wine Storage Working Losses @ 16% Ethanol

Daily: 0.335 lb-VOC/1000 gallons daily throughput
Annual: 0.230 lb-VOC/1000 gallons annual throughput

Wine Storage Working Losses @ 20% Ethanol

Daily: 0.432 lb-VOC/1000 gallons daily throughput
Annual: 0.297 lb-VOC/1000 gallons annual throughput

C. Calculations

1. Pre-Project Potential to Emit (PE1)

New Wine Tank Permit Units N-2321-652-0 through N-2321-792-0

Since these are new emissions units (fermentation and Storage), PE1 = 0 (all pollutants) for both storage and fermentation operations in these tanks.

Existing Wine Tanks

- a. Daily PE1 for each wine fermentation tank emission unit in this project:

The daily PE1 for each fermentation tank emission unit is listed in Appendix E.

b. Daily PE1 for each storage tank emission unit in this project:

The daily PE1 for each storage tank emission unit is listed in Appendix F.

c. Annual PE1 for fermentation operations:

The combined Pre-Project Potential to Emit (all existing fermentation tanks) for this facility's wine fermentation operation 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 D):

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 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 = 13,200 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 = 8,400 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 = 52,491,572 gallons

V_T = Total Winery Cooperage = 52,650,384 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

$$W1 = 316.80 \text{ MG/year (million gals/year)}$$

$$W2 = 201.60 \text{ MG/year}$$

$$W3 = 629.90 \text{ MG/year}$$

$$W4 = 126.36 \text{ MG/year}$$

Selecting $W_W = W4 = 126.36 \text{ MG/year}$ and applying the emission factor for white wine fermentation yields:

$$PE_{\text{whitefermentation}} = 315,900 \text{ lb-VOC/year}$$

2. Potential fermentation emissions from a 100% red wine production scenario 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 = 13,200 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 = 8,400 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 = 52,491,572 gallons

V_T = Total Winery Cooperage = 52,640,105 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

$$W1 = 316.80 \text{ MG/year (million gals/year)}$$

$$W2 = 201.60 \text{ MG/year}$$

$$W3 = 1,007.84 \text{ MG/year}$$

$$W4 = 140.37 \text{ MG/year}$$

Selecting $W_R = W4 = 140.37 \text{ MG/year}$ and applying the emission factor for red wine fermentation yields:

$$PE_{\text{redfermentation}} = 870,294 \text{ lb-VOC/year}$$

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.

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

$$PE_{\text{fermentation}} = PE_{\text{redfermentation}}$$

$$PE_{\text{fermentation}} = 870,294 \text{ lb-VOC/year}$$

- d. Annual PE1 for storage operations:

The storage emissions will be calculated using the procedure described in the District's FYI 114. Breathing loss emissions are considered negligible for all storage tanks, since none of the tanks are subject to any significant diurnal temperature variations. The majority of the tanks (accounting for 96.3% of the total storage volume) are enclosed stainless steel tanks with pressure/vacuum relief valves and either insulation, refrigeration or both. Per FYI 114, breathing losses from insulated and/or refrigerated tanks may be ignored since the diurnal temperature swings that are primarily responsible for breathing emissions are significantly eradicated by insulation and/or refrigeration. A few of the tanks (accounting for only 3.7% of the total storage volume) are constructed of either concrete or wood. These tanks are enclosed, equipped with pressure/vacuum relief valves and located indoors. Considering that concrete and wood are by themselves insulative materials (i.e. poor conductors of heat, compared to steel), and that the tanks are located indoors, it can be concluded that these tanks are not subject to any significant diurnal temperature ranges, and therefore have negligible breathing loss emissions. Storage emissions will therefore consist only of working loss emissions.

Since the emission factors for wine storage are the same for both white and red wine, emissions from storage tank operations are determined based on the throughput of the maximum quantity of wine the facility is able to produce. In the preceding sections, it was determined that the facility's wine production limiting factor for both red and white wines is the total cooperage (combined fermentation and storage/processing capacity). Based on cooperage, the facility's annual red wine production capacity is higher than the white wine production capacity; hence storage emissions will be based on the red wine production capacity. Based on cooperage limitations, red wine production capacity is 140.37 million gallons of per year.

Storage emissions are calculated as follows:

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

Where:

E_s = wine storage emission factor based on District FYI-114 = 0.297 lb-VOC/1000 gallons of wine transferred for 20% alcohol wine; 0.230 lb-VOC/1000 gallons of wine transferred for 16% alcohol wine; and 0.198 lb-VOC/1000 gallons of wine transferred for 14% alcohol wine;

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

W_R = maximum quantity of wine the facility can produce = 140.37 million gallons of red wine per year

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, some of the storage-only tanks have an ethanol limit less than 20%, which requires a different emission factor. Units 629-1 through 636-1 are limited to 16% ethanol and have a combined annual throughput limit of 2,001,728 gallons. Units 644-1 through 648-1 are limited to 14% ethanol and have a combined maximum throughput of 14,850,000 gallons.

$$\begin{aligned} PE_{\text{storage}} &= E_s \times T \times W_R \\ &= (0.297/1000) \times 8 \times (140.37 - 2.00 - 14.85) \times 10^6 \\ &\quad + (0.230/1000) \times 2.00 \times 10^6 \\ &\quad + (0.198/1000) \times 14.85 \times 10^6 \\ &= (293,484 + 460 + 2,940) \text{ lb-VOC/year} \\ &= 296,884 \text{ lb-VOC/year} \end{aligned}$$

2. Post Project Potential to Emit (PE2)

a. Daily PE2 for each fermentation tank emission unit:

For the pre-existing fermentation tank emission units, except the storage-only tanks that are being modified to allow fermentation, daily PE2 = daily PE1.

For new fermentation tank emission units, and tanks modified from storage-only to storage and fermentation use, daily PE2 is listed in Appendix G.

b. Daily PE2 for each storage tank emission unit:

For each existing storage tank emission unit, daily PE2 = daily PE1.

For new and modified storage tank emission units PE2 is listed in Appendix H

c. Annual PE2 for fermentation operations:

This project establishes a Specific Limiting Condition (SLC) to limit the combined post project annual fermentation emissions from 1) existing fermentation tanks, 2) existing storage tanks to be designated as fermenters as a result of this project and 3) new fermentation tanks added by this project, to the Pre-Project Potential to Emit of the existing fermentation operations.

Therefore,

$$\begin{array}{l} \text{PE2}_{\text{fermentation}} \\ \text{(existing + modified +} \\ \text{new tanks)} \end{array} = \begin{array}{l} \text{PE1}_{\text{fermentation}} \\ \text{(existing tanks)} \end{array} = 870,294 \text{ lb-VOC/yr}$$

d. Annual PE2 for each wine storage tank emission unit in this project:

This project establishes a Specific Limiting Condition (SLC) to limit the combined post project annual storage emissions from existing storage tanks and new storage tanks added through this project to the Pre-Project Potential to Emit of the existing storage operations.

Therefore,

$$\begin{array}{l} \text{PE2}_{\text{storage}} \\ \text{(existing + new tanks)} \end{array} = \begin{array}{l} \text{PE1}_{\text{storage}} \\ \text{(existing tanks)} \end{array} = 296,884 \text{ lb-VOC/yr}$$

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and 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 project only concerns VOC emissions. This facility acknowledges that its VOC emissions are already above the Offset and Major Source Thresholds for VOC emissions; therefore, SSPE1 calculations are not necessary.

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and 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 project only concerns VOC emissions. This facility acknowledges that its VOC emissions are already above the Offset and Major Source Thresholds for VOC emissions; therefore, SSPE2 calculations are not necessary.

5. Major Source Determination

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.

6. Baseline Emissions (BE)

The BE calculation (in lbs/year) is performed pollutant-by-pollutant for each unit within the project, to calculate the QNEC and if applicable, to determine the amount of offsets required.

Pursuant to Section 3.7 of District Rule 2201, BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22 of District Rule 2201.

The permit units in this project only emit VOC and therefore the BE determination is only required for this pollutant, as discussed in the following sections:

BE VOC

Units Located at a Non-Major Source

As shown in Section VII.C.5 above, the facility is a major source for VOC emissions.

Highly-Utilized Emissions Units, located at a Major Source

Due to the nature of winery operations, excess tank capacity is installed at wineries such that the actual usage is always significantly less than the potential operation. Therefore, none of the tanks in this project are Highly-Utilized Emissions Units.

Fully Offset Emissions Units, located at a Major Source

Offsets were previously provided for the storage tank emissions units for permit units N-2321-629 through 636. Therefore these are Fully Offset Emissions Units. No other units affected by this project are Fully Offset Emissions Units.

Clean Emissions Unit, Located at a Major Source

Pursuant to Rule 2201, Section 3.12, a Clean Emissions Unit is defined as an emissions unit that is "equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

All fermentation tanks in this project meet the District's current achieved-in-practice BACT for fermentation tanks (see Appendix I). Therefore all fermentation tank emissions units are *Clean Emissions Units* pursuant to District Rule 2201 and, for the combined fermentation emissions of all tanks in this project,

$$\Sigma BE_{\text{fermentation}} = \Sigma PE1_{\text{fermentation}} = 870,294 \text{ lb-VOC/year}$$

All stainless tanks in this project meet the District's current achieved-in-practice BACT for storage tanks (see Appendix J). All wood and concrete tanks meet the District's new achieved-in-practice BACT for storage tanks (see Appendix K). Therefore all storage tank emissions units are *Clean Emissions Units* pursuant to District Rule 2201 and, for the combined storage emissions of all tanks in this project,

$$\Sigma BE_{\text{storage}} = \Sigma PE1_{\text{storage}} = 296,884 \text{ lb-VOC/year}$$

7. Major Modification

Major Modification is defined in 40 CFR Part 51.165 as "*any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.*"

The *net emissions increase* is calculated as the increase in actual emissions resulting from the project. The post project actual emissions are conservatively assumed to be equal to the Post Project Potential to Emit. The calculated net emissions increase is significant if it exceeds the values in the following table:

Significance Threshold (lb/year)	
Pollutant	Threshold (lb/year)
VOC	50,000
NO _x	50,000
PM ₁₀	30,000
SO _x	80,000

This facility is a major stationary source for VOC which concedes that the Post Project Potential to Emit exceeds the pre-project baseline actual emissions by more than 50,000 lb/year for the emissions units in this project. Therefore, this project is a Major Modification.

8. Federal Major Modification

District Rule 2201, Section 3.17 states that major modifications are also federal major modifications unless they qualify for a "Less-Than-Significant Emissions Increase" exclusion.

A Less-Than-Significant Emissions Increase exclusion is for an emissions increase for the project, or a Net Emissions Increase for the project (as defined in 40 CFR 51.165 (a)(2)(ii)(B) through (D), and (F)), that is not significant for a given regulated NSR pollutant, and therefore is not a federal major modification for that pollutant.

- To determine the post-project projected actual emissions from existing units, the provisions of 40 CFR 51.165 (a)(1)(xxviii) shall be used.
- To determine the pre-project baseline actual emissions, the provisions of 40 CFR 51.165 (a)(1)(xxxv)(A) through (D) shall be used.
- If the project is determined not to be a federal major modification pursuant to the provisions of 40 CFR 51.165 (a)(2)(ii)(B), but there is a reasonable possibility that the project may result in a significant emissions increase, the owner or operator shall comply with all of the provisions of 40 CFR 51.165 (a)(6) and (a)(7).
- Emissions increases calculated pursuant to this section are significant if they exceed the significance thresholds specified in the table below.

Significant Threshold (lb/year)	
Pollutant	Threshold (lb/year)
VOC	50,000
NO _x	50,000
PM ₁₀	30,000
SO _x	80,000

The Net Emissions Increases (NEI) for purposes of determination of a "Less-Than-Significant Emissions Increase" exclusion will be calculated below to determine if this project qualifies for such an exclusion.

Since this project consists of both existing and new emissions units, the "hybrid test" specified in 40 CFR(a)(2)(ii)(F) is applicable and requires that the NEI determination be based on the sum of the individual NEI determinations for existing emissions units (NEI_E) and new emissions units (NEI_N) pursuant to 40 CFR(a)(2)(ii)(C) and (D) respectively. In addition, pursuant to 40 CFR (a)(1)(vi)(A)(2), creditable contemporaneous emissions increases (NEI_C) must also be included in the determination of the NEI. Therefore,

$$NEI = NEI_E + NEI_N + NEI_C$$

Net Emission Increase for Existing Units (NEI_E)

Per 40 CFR 51.165 (a)(1)(xxviii) and 40 CFR 51.165 (a)(2)(ii)(C) for all existing units,

$$NEI_E = PAE - BAE$$

where,

BAE = Baseline Actual Emissions which are the actual emissions created by the project during the baseline period. The BAE are calculated pursuant to 40 CFR 51.165 (a)(1)(xxv)(A) through (D). Based on confidential data and calculations submitted by the facility and verified by the District:

$$\begin{aligned} BAE &= 125.28 \text{ tons-VOC/yr} \\ &= 250,560 \text{ lb-VOC/yr} \end{aligned}$$

PAE = Projected Actual Emissions which are the post-project projected actual emissions of the existing units in this project pursuant to 40 CFR 51.165 (a)(1)(xxviii). Based on confidential data and calculations submitted by the facility and verified by the District:

$$\begin{aligned} PAE &= 160.80 \text{ tons-VOC/yr} \\ &= 321,600 \text{ lb-VOC/yr} \end{aligned}$$

Per 40 CFR 51.165 (a)(1)(xxviii)(B)(3), the portion of the existing units' emissions following the project that an existing unit *could have accommodated* during the baseline period shall be excluded from the PAE in calculating any emissions increase. Per the applicant, the existing facility could have accommodated 100 percent of the projected maximum annual emissions during the Baseline Period based strictly on increased product demand. The District's analysis of the production capacity of this facility, presented in Section VII.C.1, indicates a production capacity for this facility which is significantly higher than the facility's 10-year projection and thus the District's analysis corroborates the applicant's statements in this regard. Therefore, for this project:

$$PAE = \begin{matrix} \text{Projected} \\ \text{Maximum} \\ \text{Annual} \\ \text{Emissions} \end{matrix} - \begin{matrix} \text{Emissions following the project that an} \\ \text{existing unit } \textit{could have accommodated} \\ \text{during the baseline period} \end{matrix}$$

Since,

$$\begin{matrix} \text{Projected} \\ \text{Maximum} \\ \text{Annual} \\ \text{Emissions} \end{matrix} = \begin{matrix} \text{Emissions following the project that an} \\ \text{existing unit } \textit{could have accommodated} \\ \text{during the baseline period} \end{matrix}$$

$$PAE = 0$$

NEI_E is thus calculated as follows:

$$NEI_E = PAE - BAE = 0 - BAE$$

$$NEI_E = 0 \text{ for all existing emissions units}$$

Net Emission Increase for New Units (NEI_N)

Per 40 CFR 51.165 (a)(2)(ii)(D) for new emissions units in this project,

$$NEI_N = PE2_N - BAE$$

Since these are new units, BAE for these units is zero and,

$$NEI_N = PE2_N$$

where PE2_N is the Post Project Potential to Emit for the new emissions units.

This project includes both new fermentation tank emissions units and new storage tank emissions units. Therefore,

$$PE2_N = PE2_{N(\text{fermentation})} + PE2_{N(\text{storage})}$$

As discussed in Appendix D, 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).

In order to determine the PE2_{N(fermentation)}, a post-project determination of the fermentation emissions of the total (T) number of tanks at the facility (PE2_{T(fermentation)}) must be made which ignores the proposed Specific Limiting Condition which will be placed on the permits. Then the Pre-Project Potential to Emit of the existing (E) operation (PE1_{E(fermentation)}), as determined in Section VII.C) is subtracted from PE2_{T(fermentation)} to arrive at PE2_{N(fermentation)}.

PE2_{T(fermentation)} is determined in Appendix K to be 912,516 lb-VOC/year.

PE2_{N(fermentation)} is thus calculated as follows:

$$PE2_{N(\text{fermentation})} = PE2_{T(\text{fermentation})} - PE1_{E(\text{fermentation})} = 912,516 - 870,294 = 42,222 \text{ lb-VOC/year}$$

In order to determine the PE2_{N(storage)}, a post-project determination of the storage emissions of the total (T) number of tanks at the facility (PE2_{T(storage)}) must be made

which ignores the proposed Specific Limiting Condition which will be placed on the permits. Then the Pre-Project Potential to Emit of the existing (E) operation ($PE1_{E(\text{storage})}$), as determined in Section VII.C) is subtracted from $PE2_{T(\text{storage})}$ to arrive at $PE2_{N(\text{storage})}$.

$PE2_{T(\text{storage})}$ is determined in Appendix K to be 349,700 lb-VOC/year.

$PE2_{N(\text{storage})}$ is thus calculated as follows:

$$PE2_{N(\text{storage})} = PE2_{T(\text{storage})} - PE1_{E(\text{storage})} = 349,700 - 296,884 = 52,816 \text{ lb-VOC/year}$$

thus,

$$PE2_N = PE2_{N(\text{fermentation})} + PE2_{N(\text{storage})} = 42,222 + 52,816 = 95,038 \text{ lb-VOC/year}$$

And,

$$NEI_N = PE2_N = 95,038 \text{ lb-VOC/year}$$

Creditable Contemporaneous Emissions Increase (NEI_C)

Creditable contemporaneous emission increases are also associated with this project. These are presented in Appendix L and are as follows:

$$NEI_C = 480 \text{ lb-VOC/year}$$

The NEI for this project is thus calculated as follows:

$$NEI = NEI_E + NEI_N + NEI_C$$

$$NEI = 0 + 95,038 + 480 = 95,518 \text{ lb-VOC/year}$$

The NEI for this project will be greater than the federal Major Modification threshold of 50,000 lb-VOC/year. Therefore, this project does not qualify for a "Less-Than-Significant Emissions Increase" exclusion and is thus determined to be a Federal Major Modification.

VIII. Compliance

Rule 1070 Record keeping

This rule applies to any source operation, which emits or may emit air contaminants. The rule allows the District to perform inspections for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations. The rule also allows the District to require record keeping, to make inspections and to conduct tests of air pollution sources.

Record keeping conditions for records required to verify compliance with NSR requirements will be placed on the ATCS under the authority of this rule.

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

The applicant is proposing to install 128 new wine fermentation and storage tanks with a PE greater than 2 lb/day for VOC. Thus BACT is triggered for VOC for these emissions units.

b. Relocation of emissions units – PE > 2 lb/day

There are no emissions units being relocated from one stationary source to another, hence BACT is not triggered under this category.

c. Modification of emissions units – AIPE > 2 lb/day

$$\text{AIPE} = \text{PE2} - \text{HAPE}$$

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

PE2 = Post-Project Potential to Emit, (lb/day)

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

Where,

- PE1 = The emissions unit's Potential to Emit prior to modification or relocation, (lb/day)
- EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1
- EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

$$AIPE = PE2 - (PE1 * (EF2 / EF1))$$

All existing fermentation tanks in this facility are modified by this project. For these emissions units, PE2 = PE1 and EF2 = EF1. Therefore, per the above equation, AIPE = 0 for all modified fermentation emissions units in the project.

Storage tank emissions units 629-2 through 636-2 and 644-2 through 648-2 are modified by this project. The following table calculates the fermentation emissions AIPE for these units:

AIPE					
Permit Unit	PE2 lb/day	EF2 lb/1000 gal	PE1 lb/day	EF1 lb/1000 gal	AIPE = PE2 - PE1(EF2/EF1) lb/day
629-2	216.4	3.46	0.0	3.46	216.4
630-2	216.4	3.46	0.0	3.46	216.4
631-2	216.4	3.46	0.0	3.46	216.4
632-2	216.4	3.46	0.0	3.46	216.4
633-2	216.4	3.46	0.0	3.46	216.4
634-2	216.4	3.46	0.0	3.46	216.4
635-3	216.4	3.46	0.0	3.46	216.4
636-2	216.4	3.46	0.0	3.46	216.4
644-2	21.8	3.46	0.0	3.46	21.8
645-2	41.8	3.46	0.0	3.46	41.8
646-2	41.8	3.46	0.0	3.46	41.8
647-2	41.8	3.46	0.0	3.46	41.8
648-2	41.8	3.46	0.0	3.46	41.8

As demonstrated above, the AIPE is greater than 2.0 lb/day for VOC emissions for these modified emissions units; therefore BACT is triggered.

d. Major Modification

As discussed in Section VII.C.7 above, this project does constitute a Major Modification for VOC emissions; therefore BACT is triggered for VOC for all emissions units affected by this stationary source project.

2. BACT Guidelines

BACT Guideline 5.4.x, *Wine Fermentation Tanks*, applies to all fermentation tanks in this project. (See Appendix I)

BACT Guideline 5.4.13, *Wine Storage Tanks*, applies to all wine storage tanks in this project. (See Appendix J)

3. Top-Down BACT Analysis

Per Permit Services Policies and Procedures for BACT, a Top-Down BACT analysis shall be performed as a part of the application review for each application subject to the BACT requirements pursuant to the District's NSR Rule.

Fermentation Tanks

Pursuant to the attached Top-Down BACT Analysis (see Appendix I), BACT has been satisfied with the following:

VOC: Open tank vented to the atmosphere

Wine Storage Tanks

Pursuant to the attached Top-Down BACT Analysis (see Appendix J), BACT has been satisfied with the following:

VOC: Insulation or Equivalent, Pressure Vacuum Relief Valve (PVRV) set within 10% of the maximum allowable working pressure of the tank; "gas-tight" tank operation; and continuous storage temperature not exceeding 75 oF, achieved within 60 days of completion of fermentation.

The following conditions will be placed on the ATCs to ensure compliance with the requirements of BACT:

For Stainless Steel Tanks \geq 5,000 Gallons (Subject to District Rule 4694):

- *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, 5.2.1]*
- *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, 5.2.1] N*

- *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, 5.2.2] N*

For Stainless Steel Tanks < 5,000 Gallons, Concrete and Wood Tanks (Not Subject to District Rule 4694):

- *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 Rule 2201]*
- *When this tank is used for wine storage, the pressure-vacuum relief valve and storage tank shall remain in a gas-tight condition, as defined in District rule 4694, 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 2201] N*
- *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 1070 and 2201] N*

B. Offsets

1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post Project Stationary Source Potential to Emit (SSPE2) equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

Facility emissions are already above the Offset and Major Source Thresholds for VOC emissions; therefore, offsets are triggered.

2. Quantity of Offsets Required

As discussed above, the facility is an existing Major Source for VOC and the SSPE2 is greater than the offset thresholds; therefore offset calculations will be required for this project.

Per Sections 4.7.1 and 4.7.3, the quantity of offsets in pounds per year for VOC is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = $(\Sigma[PE2 - BE] + ICCE) \times DOR$, for all new or modified emissions units in the project,

Where,

PE2 = Post Project Potential to Emit, (lb/year)

BE = Baseline Emissions, (lb/year)

ICCE = Increase in Cargo Carrier Emissions, (lb/year)

DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE)

There are no increases in cargo carrier emissions due to this project. Therefore

Offsets Required (lb/year) = $\Sigma[PE2 - BE] \times DOR = [\Sigma PE2 - \Sigma BE] \times DOR$

Per section VIII.C.6, $\Sigma BE = 1,167,178$ lb-VOC/year

Per section VIII.C.2, $\Sigma PE2 = 1,167,178$ lb-VOC/year

Offsets Required (lb/year) = $[1,167,178 - 1,167,178] \times DOR$
= 0 lb-VOC/year x DOR
= 0 lb-VOC/year

C. Public Notification

1. Applicability

Public noticing is required for:

- a. Any new Major Source, which is a new facility that is also a Major Source,
- b. Major Modifications,
- c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,

- d. Any project which results in the offset thresholds being surpassed, and/or
- e. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Source

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

b. Major Modification

As demonstrated in VII.C.7, this project is a Major Modification; therefore, public noticing for Major Modification purposes is required.

c. PE > 100 lb/day

Applications which include a new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. None of the new emission units included in this project have a daily PE exceeding 100 lb/day, hence public notice is not triggered under this category.

d. Offset Threshold

Since this project concerns only VOC emissions and this facility was a major source for VOC prior to this project (SSPE > 50,000 lb-VOC/year), the offset threshold was not surpassed in this project; therefore public noticing is not required for offset purposes.

e. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e. $SSIPE = SSPE2 - SSPE1$. This project concerns only VOC emissions with no increases in annual emissions, as discussed in Section VII.C.2, hence public notice is not triggered under this category.

2. Public Notice Action

As discussed above, public noticing is required for this project since it is a Major Modification. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATC for this equipment.

D. Daily Emission Limits (DELs)

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

For all fermentation emissions units, the DEL is stated in the form of an emission factor (lb-VOC/day-1000 gallon tank capacity) and the capacity rating of the tank as listed on the permit. These units are also subject to a separate annual emission limit (expressed in lb-VOC per year) in the form of a Specific Limiting Condition (SLC).

For all wine storage tank emissions units affected by this project, the DEL is stated in the form of a daily limit on tank throughput and a maximum ethanol content for wine stored in the tank. These units are also subject to a separate annual emission limits (expressed in lb-VOC per year) in the form of a Specific Limiting Condition (SLC).

Proposed Rule 2201 (DEL) Conditions:

Red wine fermentation tanks:

- *The daily VOC emissions rate for red wine fermentation shall not exceed 3.46 lb/1000 gallons. [District Rule 2201]*

White wine fermentation tanks:

- *The daily VOC emissions rate for white wine fermentation shall not exceed 1.62 lb/1000 gallons. [District Rule 2201]*

Wine storage tanks: (all units):

- *The ethanol content of wine stored in this tank shall not exceed 20 percent by volume. [District Rule 2201]*
- *When this tank is used for wine storage, the daily tank throughput shall not exceed four times the maximum nominal tank capacity stated on the equipment description. [District Rule 2201]*

All tank permits

- *Total annual VOC emissions from all wine fermentation and wine storage operations at this facility shall not exceed 1,167,178 lb. [District Rule 2201]*
- *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]

- *Total annual VOC emissions from wine storage operations may be determined using the total annual wine throughput and a single storage emission factor based on the average ethanol content of the annual wine throughput; or using the throughputs for different batches of wine and batch-specific emission factors based on the ethanol content of each batch. [District Rule 2201]*

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offsets, public notification and daily emission limit requirements of Rule 2201. Recordkeeping is also required for winery tanks pursuant to District Rule 4694, *Wine Fermentation and Storage Tanks*. The following conditions will be placed on the permits:

Wine Fermentation and Storage Tank Permits:

- *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, 5.2.2] N*
- *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 Rule 4694, 6.4.1] N*
- *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] N*

- *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] N*

Fermentation-Only Tank Permits

- *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 Rule 4694, 6.4.1] N*

Storage-Only Tank Permits:

- *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, 5.2.2] N*
- *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] N*
- *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] N*

All Tank permits:

- *Records of total annual fermentation and total annual storage emissions, including calculation methods and parameters used, shall be maintained. [District Rule 1070 and 2201] N*
- *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]*
- *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] N*

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

F. Ambient Air Quality Analysis

Section 4.14.1 of this Rule requires that an ambient air quality analysis (AAQA) be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. However, since this project involves only VOC and no ambient air quality standard exists for VOC, an AAQA is not required for this project.

G. Compliance Certification

The compliance certification is required for any project, which constitutes a New Major Source or a Federal Major Modification.

Section 4.15.2 of this Rule requires the owner of a new Major Source or a source undergoing a Title I Modification to demonstrate to the satisfaction of the District that all other Major Sources owned by such person and operating in California are in compliance or are on a schedule for compliance with all applicable emission limitations and standards. As discussed in the preceding sections, this project does constitute a Federal Major Modification, therefore this requirement is applicable.

Included in Appendix M is Constellation Wines U.S.'s compliance certification.

H. Alternative Siting Analysis

Alternative siting analysis is required for any project, which constitutes a New Major Source or a Federal Major Modification.

The current project occurs at an existing winery with a pre-project total wine tank volume of 53,046,559 gallons. The applicant proposes to install new winery tanks totaling 2,146,759 gallons in volume, which represents an increase of 4% of the existing total wine tank volume.

In addition to winery tanks, the operation of a winery requires a large number support equipment, services and structures such as raw material receiving stations, crushers, piping, filtering and refrigeration units, warehouses, laboratories, bottling and shipping facilities, and administration buildings.

Since the current project involves only a minimal increase in the winery's total tank volume and no change to any other facets of the operation, the existing site will result in the least possible impact from the project. Alternative sites would involve the relocation and/or construction of various support structures and facilities on a much greater scale, and would therefore result in a much greater impact.

Rule 2520 Federally Mandated Operating Permits

Pursuant to their current operating permit, this facility is an existing major source. The proposed project constitutes a Significant Modification to the Title V Permit pursuant to Section 3.29. 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.

Rule 4001 New Source Performance Standards (NSPS)

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to wine fermentation and storage tank operations.

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to wine fermentation and storage tank operations.

Rule 4102 Nuisance

Rule 4102 states that no air contaminant shall be released into the atmosphere which causes a public nuisance. Public nuisance conditions are not expected as a result of the proposed operations provided the equipment is well maintained. Therefore, the following condition will be listed on each permit to ensure compliance:

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

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in hazardous air pollutants (HAP) associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

Ethanol is not a HAP as defined by Section 44321 of the California Health and Safety Code. Therefore, there are no increases in HAP emissions associated with any emission units in this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

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 all facilities with fermentation emissions in excess

of 10 tons-VOC/year. The storage tank provisions of this rule apply to all tanks with capacity in excess of 5,000 gallons.

Section 5.1 requires the winery operator achieve Required Annual Emissions Reductions (RAER) equal to at least 35% of the winery's Baseline Fermentation Emissions (BFE). Per the definition of RAER in Section 3.25 of the Rule, the RAER may be achieved by any combination of Fermentation Emission Reductions (FER), Certified Emission Reductions (CER) or District Obtained Emission Reductions (DOER) as established in the facility's District-approved Rule 4694 Compliance Plan, due every three years on December 1st beginning in 2006. The facility has submitted the required plan to the District and is currently satisfying the required emission reductions in the form of Certified Emission Reductions.

The following condition on the facility-wide permit (unit 0-1) ensures compliance:

- *The winery operator shall achieve required annual emissions reductions (RAER) equal to at least 35% of the winery's baseline fermentation emissions (BFE) [District Rule 4694] N*

Section 5.2 places specific restrictions on wine storage tanks with 5,000 gallons or more in capacity when such tanks are not constructed of wood or concrete. Section 5.2.1 requires these tanks to be equipped and operated with a pressure-vacuum relief valve meeting all of the following requirements:

- The pressure-vacuum relief valve shall operate within 10% of the maximum allowable working pressure of the tank,
- The pressure-vacuum relief valve shall operate in accordance with the manufacturer's instructions, and
- The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings.
- 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.

The following conditions will be placed on the permits for stainless steel tanks \geq 5,000 gallons in capacity to ensure compliance with the requirements of Section 5.2.1:

- *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, 5.2.1] N*
- *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, 5.2.1] N*

Section 5.2.2 requires that the temperature of the stored wine be maintained at or below 75° F.

The following condition will be placed on the permits for stainless steel tanks ≥ 5,000 gallons in capacity to ensure compliance with the requirements of Section 5.2.2:

- *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, 5.2.2] N*

Every three years, Section 6.1 and 6.2 require the facility to submit a Three-Year Compliance Plan and a Three-Year Compliance Plan Verification respectively. Section 6.3 requires that an Annual Compliance Plan Demonstration be submitted to the District no later than February 1 of each year to show compliance with the applicable requirements of the Rule. Section 6.4.3 requires that all monitoring be performed for any Certified Emission Reductions as identified in the facility's Three-Year Compliance Plan and that the records of all monitoring be maintained.

The following conditions on the facility-wide permit (unit 0-1) ensure compliance:

- *By December 1, 2006, and every three years thereafter, the winery operator subject to the requirements of Section 5.1 shall submit to the District a three-year compliance plan that demonstrates compliance with the applicable requirements of District Rule 4694 for each year of the applicable compliance period. The three-year compliance plan shall include all the information specified in sections 6.1.1 through 6.1.8 of the rule. [District Rule 4694, 6.1] N*
- *By July 1, 2007, and every three years thereafter, the winery operator shall submit to the District a three-year compliance plan verification that demonstrates that the three-year compliance plan elements are in effect. The compliance plan verification shall include all the information specified in sections 6.2.1 through 6.2.5 of District Rule 4694. [District Rule 4694, 6.2] N*
- *By February 1, 2008, and every year thereafter, the winery operator shall submit to the District an annual compliance plan demonstration that shows compliance with the applicable requirements of District Rule 4694. The compliance plan demonstration shall include all the information specified in sections 6.3.1 through 6.3.7 of the rule. All additional Required Annual Emissions Reductions (RAER) shall be obtained by April 1 of the year of the Annual Compliance Demonstration, per section 6.3.7.2 of the rule. [District Rule 4694, 6.3] N*
- *Operators using CER to mitigate fermentation emissions shall perform all monitoring and recordkeeping, as established in their approved Three-Year Compliance Plan, and shall maintain all records necessary to demonstrate compliance. [District Rule 4694]*

Section 6.4.1 requires that records be kept for each fermentation batch. The following condition will be placed on the permits for each fermentation tank to ensure compliance with the requirements of Section 6.4.1.

- *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 emissions 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] N*

Section 6.4.2 requires that weekly records be kept of wine volume and temperature in each storage tank. The following conditions will be placed on the permit for each storage tank to ensure compliance with the requirements of Section 6.4.2:

- *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] N*

Section 6.4 requires that records required by this rule be maintained, retained on-site for a minimum of five years, and made available to the APCO upon request. The following conditions will be placed on all permits to ensure compliance:

- *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] N*

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.

- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue the proposed Authorities to Construct subject to the permit conditions on the attached draft Authorities to Construct in Appendix O.

X. Billing Information

Billing information is listed in Appendix N.

XI. Appendices

- A: Current PTOs
- B: Pre-Project Equipment Descriptions
- C: ATC Equipment Descriptions
- D: Draft Policy for Calculation of Winery Emissions
- E: Daily PE1 for Fermentation Tank Emissions Units
- F: Daily PE1 for Storage Tank Emissions Units
- G: Daily PE2 for Fermentation Tank Emissions Units – New Tanks and Storage-Only Tanks Modified to Allow Fermentation
- H: Daily PE2 for Storage Tank Emissions Units – New Tanks
- I: BACT Guideline and Top-Down Analysis for Wine Fermentation Tanks
- J: BACT Guideline 5.4.13 and Top-Down Analysis for Wine Storage Tanks
- K: Calculation of Post Project Potential to Emit Under Non-SLC Scenario
- L: Contemporaneous Emissions
- M: Compliance Certification
- N: Billing Information
- O: Draft ATCs

Appendix A

Current PTOs

San Joaquin Valley Air Pollution Control District

FACILITY: N-2321-0-1

EXPIRATION DATE: 08/31/2011

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: RME INC - WOODBRIDGE WINERY

Location: 5950 E WOODBRIDGE ROAD, ACAMPO, CA 95220

N-2321-0-1 : Aug 17 2009 4:38PM - AYABEU

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. 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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. On March 31, 2007, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. The winery operator shall achieve required annual emissions reductions (RAER) equal to at least 35% of the winery's baseline fermentation emissions (BFE) [District Rule 4694]
44. By December 1, 2006, and every three years thereafter, the winery operator subject to the requirements of Section 5.1 shall submit to the District a three-year compliance plan that demonstrates compliance with the applicable requirements of District Rule 4694 for each year of the applicable compliance period. The three-year compliance plan shall include all the information specified in sections 6.1.1 through 6.1.8 of the rule. [District Rule 4694, 6.1]
45. By July 1, 2007, and every three years thereafter, the winery operator shall submit to the District a three-year compliance plan verification that demonstrates that the three-year compliance plan elements are in effect. The compliance plan verification shall include all the information specified in sections 6.2.1 through 6.2.5 of District Rule 4694. [District Rule 4694, 6.2]
46. By February 1, 2008, and every year thereafter, the winery operator shall submit to the District an annual compliance plan demonstration that shows compliance with the applicable requirements of District Rule 4694. The compliance plan demonstration shall include all the information specified in sections 6.3.1 through 6.3.7 of the rule. All additional Required Annual Emissions Reductions (RAER) shall be obtained by April 1 of the year of the Annual Compliance Demonstration, per section 6.3.7.2 of the rule. [District Rule 4694, 6.3]
47. Operators using certified emission reductions (CER) to mitigate fermentation emissions shall perform all monitoring and recordkeeping, as established in their approved three-year compliance plan, and shall maintain all records necessary to demonstrate compliance. [District Rule 4694]
48. Payment of District Obtained Emissions Reductions (DOER) and administrative fees shall be made to the District no later than March 1, of the first year in the applicable compliance period. [District Rule 4694, 6.1.5.3.5]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-14-1

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

26,470 GALLON CONCRETE LINED RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 1

PERMIT UNIT REQUIREMENTS

1. 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 emissions 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]
2. 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-15-1

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

26,470 GALLON CONCRETE RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 2

PERMIT UNIT REQUIREMENTS

1. 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 emissions 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]
2. 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-16-1

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

26,470 GALLON CONCRETE RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 3

PERMIT UNIT REQUIREMENTS

1. 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 emissions 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]
2. 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-17-1

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

26,470 GALLON CONCRETE RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 4

PERMIT UNIT REQUIREMENTS

1. 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 emissions 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]
2. 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-18-1

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

30,129 GALLON CONCRETE LINED RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 5

PERMIT UNIT REQUIREMENTS

1. 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 emissions 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]
2. 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-19-1

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

30,129 GALLON CONCRETE RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 6

PERMIT UNIT REQUIREMENTS

1. 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 emissions 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]
2. 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-20-1

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

30,129 GALLON CONCRETE RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 7

PERMIT UNIT REQUIREMENTS

1. 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 emissions 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]
2. 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-21-1

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

30,129 GALLON CONCRETE RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 8

PERMIT UNIT REQUIREMENTS

1. 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 emissions 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]
2. 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-22-1

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

30,129 GALLON CONCRETE RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 9

PERMIT UNIT REQUIREMENTS

1. 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 emissions 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]
2. 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2321-23-1

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

30,129 GALLON CONCRETE RED AND WHITE WINE FERMENTATION AND WINE STORAGE TANK 10

PERMIT UNIT REQUIREMENTS

1. 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 emissions 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]
2. 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.